US EPA RECORDS CENTER REGION 5
1001581

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Date: September 29, 2010

Initial: CMStewart

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Facility Identification Number: ILD 005463344

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Note: Transmittal Letter to Be Included with Reports.
Comments: _____

Illinois Environmental Protection Agency · P. O. Box 19276, Springfield, IL 62794-9276

217/782-6761

Refer to: 1838040027 -- Vermilion County
Danville/Allied Signal
ILD005463344
UIC Compliance File

December 22, 1988

Allied-Signal, Inc.
Attn: Don Phillips
P.O. Box 13
Danville, Illinois 61834

Dear Mr. Phillips:

The purpose of this letter is to follow-up on conversations between you and Barton Day, your attorney, and John Richardson and Ed Bakowski on December 19, 1988, regarding problems with the operation of your injection well. You were contacting the Agency to inform Compliance personnel of apparent noncompliance with your permit requirements and to request approval for continued operation of the well for a limited period of time while the inner annulus pressure is slightly below the permitted minimum value.

You explained that the annulus pressure decrease appears to be related to decreases in the temperature of injected fluids, which are influenced by decreases in ambient air temperatures. You informed the Agency that the annulus pressure had dropped to 214 psig (one psig below the permitted minimum of 215 psig) while the city water at a temperature of about 47°F was being injected. When process waste at a temperature of about 80°F was injected, the annulus pressure rose to 220 psig. You indicated that the lowest annulus pressure your facility had recorded was 210 psig on January 7, 1988 during a period of cold weather. Attempts to repressurize the annulus by adding kerosene have been unsuccessful. However, you indicated that there does not appear to be a compromise in the mechanical integrity of the system.

On December 21, 1988, John Richardson and Karen Nelson witnessed a conductivity test on your well's inner annulus anode system. At that time, the annulus monitoring system appeared to be functioning properly and would apparently be able to detect a rise of injected fluid into the inner annulus. They also evaluated data, provided to them by you, that appears to indicate an inverse relationship between the temperature of injected fluids and the pressure on the inner annulus.

Based on the information provided during conversations between you and Agency personnel, the apparent integrity of the annulus monitoring system, and knowledge about well operations, the Agency is granting approval to operate your injection well (Well #1) for a period of 30 days from the date of this letter if the following conditions are met:

a) The inner annulus shall be maintained at a minimum pressure of 210 psig. The well shall be shut in if the annulus pressure drops below 210 psig.

b) You must submit a report which describes the circumstances that brought about the apparent noncompliance, how long the apparent noncompliance occurred, and a plan of action that will eliminate any future noncompliance; this must be submitted to the Agency within 20 days from the date of this letter.

Please be reminded that this letter does not relieve Allied Signal of any other permit requirements. If you have any questions, please contact John Richardson or Ed Bakowski at 217/782-6761.

Very truly yours,

Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

LWE:JPR:dks/3924j, 40-41

cc: Divsion File
Springfield Region
John Richardson
Ed Bakowski
Doug Clay
Harry Chappel
Tom Cavanagh
Ed Mehnert, ISGS
John Nealon, ISWS
John Taylor, USEPA-Region V, 5WD-TUB
George Hudak, USEPA-Region V, 5WD-TUB

Illinois Environmental Protection Agency · P. O. Box 19276, Springfield, IL 62794-9276

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Very truly yours,

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Permit Section
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John Nealon, ISWS
John Taylor, USEPA-Region V, 5WD-TUB
George Hudak, USEPA-Region V, 5WD-TUB

ILLINOIS POLLUTION CONTROL BOARD
October 20, 1988

VINCENT A. KOERS, alone, and in Conjunction with DANVILLE CITIZENS FOR CONTROL OF HAZARDOUS WASTE INJECTION,	)	
Petitioners,	)	
v.	)	PCB 88-163
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY, and ALLIED-SIGNAL, INC.,	)	
Co-Respondents.	)	

ORDER OF THE BOARD (by J.D. Dumelle):

This matter comes before the Board upon receipt of an October 13, 1988 Motion For Hearing And Appeal Of Underground Injection Control Permit, No. UIC-003-WI-AC. In sum, the motion requests leave, by Vincent A. Koers and the Danville Citizens For Control Of Hazardous Waste Injection, to contest the issuance of permit and permit conditions imposed by the Illinois Environmental Protection Agency (IEPA) upon Allied-Signal, Inc.'s permit for underground injection well. The Petitioners, seeking modification of the issued permit, ask this Board to impose permit conditions not required by the IEPA.

Generally, third party standing to attack issued permits and permit conditions is well settled: Third party challenges to permits are not allowed. Landfill, Inc., v. IPCB, 74 Ill. 2d 541, 25 Ill. Dec. 602, 387 N.E.2d 258, 264. Currie, Enforcement Under Illinois Pollution Law, 70 NW U.L. Rev. 389, 475 N. 427 (1975). Notwithstanding the above, Ill. Rev. Stat. 1988 ch. 111 1/2, par. 1040(b) specifically grants standing to third parties (such as Petitioners in this case) to contest issuance of RCRA permits for hazardous waste disposal sites. There is some question whether the Act does, in fact, confer standing on third parties to challenge UIC permits and permit conditions imposed by the IEPA.

For these reasons the Board does hereby order the parties to brief the issue whether third parties have standing to challenge UIC permits and permit conditions, and to inform the Board whether this action is frivolous or duplicative of another proceeding as referenced in Section 1040(b). The Board further orders the parties to file their briefs no later than November 15, 1988.

IT IS SO ORDERED.

44

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

5HS-12

13 JUN 1988

Mr. Don M. Phillips
Plant Manager
Allied-Signal Inc.
P.O. Box 13
Danville, Illinois 61834

Re: Allied Corporation
ILD 005 463 344

Dear Mr. Phillips:

The United States Environmental Protection Agency has reviewed the information which you submitted to this office on April 28, 1988. The stated actions adequately address the land disposal restriction deficiencies outlined in our April 5, 1988, Notice of Violation.

Your cooperation and efforts in this matter are appreciated. Should you have further questions, please feel free to contact Mr. Ronald Brown of my staff at (312) 886-4463.

Sincerely yours,

Paul E. Dimock, Chief
IL/MI/WI Enforcement Program Section

cc: Glenn Savage, IEPA, FOS
Harry Chappel, IEPA, CMS

	CONCURRENCES							
SYMBOL								
SURNAME	O.R	REB		P.E.D				
DATE	6/8/88	6-9-88		6-10-88				

EPA Form 1320-1 (12-70)

OFFICIAL FILE COPY

*U.S. GPO : 1985-467-853

Allied Signal

Allied-Signal Inc.
P.O. Box 13
Danville, IL 61834
Telephone (217) 446-4700

April 28, 1988

Paul E. Dimock
Chief, Enforcement Section
US Environmental Protection Agency
Region V
230 South Dearborn Street
Chicago, IL 60604

RE: USEPA NOV LETTER DATED APRIL 5, 1988

Dear Mr. Dimock:

We are in receipt of your letter regarding an inspection conducted by Karen S. Nelson of the Illinois Environmental Protection Agency on September 4, 1987. Your notice indicates this facility failed to determine the appropriate treatability group for plant generated F-solvent wastes and to send proper notification with manifested waste shipments. Please be advised that the 9/4/87 inspection findings are in error. The appropriate treatability group determination for the plant generation and the appropriate notifications were provided with each waste shipment manifest since November 8, 1986, the effective date of the subject regulations. The inspection findings are believed to be in error as a result of a misunderstanding between Ms. Nelson and George Kady of my staff at the time of the inspection. This misunderstanding was discussed with Ms. Nelson on April 8, 1988.

As evidence of our compliance with the subject regulations, we have attached copies of the manifests and the applicable F-solvent waste notification for each shipment of F-solvent waste made between November 8, 1986 and September 4, 1987.

I hope this letter clarifies this apparent misunderstanding. Please contact me if you have any questions.

Sincerely,

Don M. Phillips
Plant Manager

RECEIVED
U.S. EPA, REGION V
WASTE MANAGEMENT DIVISION
OFFICE OF THE DIRECTOR

DMP:sjb

Attachments

cc: Karen Nelson, Illinois Environmental Protection Agency
Division of Land Pollution Control - #24
Compliance Monitoring Section
2200 Churchill Road
Springfield, IL 62794-9276

STATE OF ILLINOIS ENVIRONMENTAL PROTECTION AGENCY DIVISION OF LAND POLLUTION CONTROL

2200 CHURCHILL ROAD, SPRINGFIELD, ILLINOIS 62706 (217) 782-

IL532-0610

LPC 62 8/81

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) **EPA Form 8700-22 (3-84)** Form Approved. OMB No. 2050-0039. Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. ILD055463344 Manifest Document No. 87015

2. Page 1 of 1 — Information in the shaded areas is not required by Federal law, but is required by Illinois law.

3. Generator's Name and Mailing Address: Allied Corporation, #5 Brewer Road, Danville, IL. 61834-0013

4. Generator's Phone (217) 446-4700

A. Illinois Manifest Document Number: IL 1668037

B. Illinois Generator's ID: 1 8 3 8 0 4 0 0 2 7

5. Transporter 1 Company Name: Chemical Waste Management

6. US EPA ID Number: ILD099202681

C. Illinois Tranporter's ID: 00[illegible]

D. (312) 396 1050 Transporter's Phone

7. Transporter 2 Company Name

8. US EPA ID Number

E. Illinois Transporter's ID

F. ( ) Transporter's Phone

9. Designated Facility Name and Site Address: Trade Waste Incineration, 7 Mobile Ave., Sauget IL. 62201 - 1069

10. US EPA ID Number: ILD098642424

G. Illinois Facility's ID: 1 6 3 1 2 1 0 0 0 9

H. Facility's Phone: (618) 271 2804

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	HM	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. RQ Paint Related Material, Combustible NA 1263 RQ 100# (45.4) Liquid	✓	002	DM	110	1	EPA HW Number: XXD001; Authorization Number: OFQ0001
b.						EPA HW Number: XX; Authorization Number:
c.						EPA HW Number: XX; Authorization Number:
d.						EPA HW Number: XX; Authorization Number:

J. Additional Descriptions for Materials Listed Above: 2- drums E64384 (Paint)

K. Handling Codes for Wastes Listed Above In Item #14: 1 = Gallons 2 = Cubic Yards

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, and Illinois regulations.

Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment.

Printed/Typed Name: Anthony R. Thompson (Foreman) Signature: Anthony R. Thompson Date: Month 10 Day 14 Year 87

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name: JAMES DAVIS (DRIVER) Signature: James Davis Date: Month 10 Day 14 Year 87

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name: Signature: Date: Month Day Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.

Printed/Typed Name: DIANE BALDOVSKI Signature: Diane Baldovski Date: Month 10 Day 16 Year 87

IN ILLINOIS: 217 / 782-3637 24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS* OUTSIDE ILLINOIS: 800 / 424-8802 or 202 / 426-2675

DISTRIBUTION: PART - 1 GENERATOR PART - 2 IEPA PART - 3 FACILITY PART - 4 TRANSPORTER PART - 5 IEPA PART - 6 GENERATOR

REV. #6

GENERATOR COPY – PART 1- DO NOT REMOVE PART 1 FROM SET UNTIL COMPLETED.

This Agency is authorized to require, pursuant to Illinois Revised Statutes 1983, Chapter 111½ Section 21, that this information be submitted to the Agency. Failure to provide the information may result in a civil penalty against the owner or operator of not to exceed $25,000 per day of violation. Falsification of this information may result in a fine up to $50,000 per day of violation and imprisonment up to 5 years. This form has been approved by the Forms Management Center.

10/14/87

12/30/87

Form A

GENERATOR NOTIFICATION TO TREATMENT FACILITY
WHERE RESTRICTED WASTE REQUIRES TREATMENT PRIOR TO LAND DISPOSAL

Generator: Allied Corp Profile #: E6438C

This Notification is submitted to Trade Waste Incineration in accordance with regulations effective November 8, 1986 to be promulgated at 40 CFR Section 268.7(a)(1). 40 CFR Section 268.7(a) requires the generator to test his waste or an extract developed using the Toxicity Characteristic Leaching Procedure (TCLP) described in Appendix I of Part 268 51 Fed. Reg. 40,643, or using knowledge of the waste to determine if the waste is restricted from land disposal.

EPA Hazardous Waste No. F001, F002, F003, F004, and F005 are "restricted wastes" and banned from land disposal effective November 8, 1986, unless one or more of the following conditions apply: (1) the generator of the solvent waste is a small quantity generator, (2) the solvent waste is generated from response action taken under CERCLA or corrective action taken under RCRA, or (3) the solvent waste is a solvent-water mixture, solvent-containing sludge or solvent-contaminated soil (non-CERCLA or RCRA corrective action) containing less than 1% (10,000 ppm) total F001-F005 solvent constituents listed in Table CCWE of Section 268.41. (This Table is reprinted on the reverse side).

If a generator determines he is managing a restricted waste and the waste requires treatment prior to land disposal, for each shipment of such waste, the generator must notify the treatment facility in writing of the appropriate treatment standard. This notification must include the information to be provided below.

1. EPA Hazardous Waste Number F003 - F005
2. CWMI Waste Material Profile Number E6438C
3. Corresponding Treatment Standard (see REVERSE SIDE)
4. Manifest Number associated with this shipment of waste IL1668037
5. Waste analysis data, where available (please attach) AT TWI

I hereby certify that all information submitted in this and all associated documents is complete and accurate to the best of my knowledge and information.

PLEASE BE SURE TO CHECK THE APPROPRIATE BOX(ES) ON THE REVERSE SIDE BEFORE SIGNING.

George Kaelin Supv. Safety + Pollution Control 10/15/87
Signed (authorized representative of generator) Title Date

Note: A copy of this Notice must accompany each manifested load as required by 40 CFR 268.7(a)(1).

CORRESPONDING TREATMENT STANDARD

Instructions: For each solvent waste constituent present in your waste shipment, check the appropriate box in front of the applicable treatment standard(s). If based upon best knowledge and information, your waste shipment may contain some or all of the solvent constituents listed below, please mark the appropriate box(es) or the box labeled "All of the above" at the bottom.*

Solvent Constituent	Treatment Standard (mg/l) Wastewaters		All Other Wastes	
Acetone		0.05		0.59
n-Butyl alcohol		5.0		5.0
Carbon disulfide		1.05		4.81
Carbon tetrachloride		0.05		0.96
Chlorobenzene		0.15		0.05
Cresols		2.82		0.75
Cresylic acid		2.82		0.75
Cyclohexanone		0.125		0.75
1,2-Dichlorobenzene		0.65		0.125
Ethyl acetate		0.05		0.75
Ethyl benzene		0.05		0.053
Ethyl ether		0.05		0.75
Isobutanol		5.0		5.0
Methanol		0.25		0.75
Methylene chloride		0.20		0.96
Methylene chloride (from pharmaceutical industry)		12.7		0.96
Methyl ethyl ketone		0.05		0.75
Methyl isobutyl ketone		0.05		0.33
Nitrobenzene		0.66		0.125
Pyrdine		1.12		0.33
Tetrachloroethylene		0.079		0.05
Toluene		1.12	✓	0.33
1,1,1-Trichloroethane		1.05		0.41
1,2,2-Trichloro-1,2,2-trifluroethane		1.05		0.96
Trichloroethylene		0.062		0.091
Trichlorofluoromethane		0.05		0.96
Xylene		0.05	✓	0.15
All of the above*				

* Please note that where a generator's determination of the appropriate treatment standard is based upon his knowledge of the waste, the generator must maintain in his operating record all supporting data used to make this determination. See 51 Fed. Reg. at 40,597.

STATE OF ILLINOIS — ENVIRONMENTAL PROTECTION AGENCY · DIVISION OF LAND POLLUTION CONTROL

2200 CHURCHILL ROAD, SPRINGFIELD, ILLINOIS 62706 (217) 782-6761

IL532-0610

LPC 62 8/81

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) **EPA Form 8700-22 (3-84)** Form Approved. OMB No. 2000-0404. Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. ILD005463344 Manifest Document No. 187003

2. Page 1 of 1 — Information in the shaded areas is not required by Federal law, but is required by Illinois law.

3. Generator's Name and Mailing Address: Allied Corporation, P.O. Box 13 #5 Brewer Rd., Danville, IL 61834-0013

A. Illinois Manifest Document Number: IL 1529030

4. Generator's Phone (217) 446-4700

B. Illinois Generator's ID: 1 8 3 8 0 4 0 0 2 7

5. Transporter 1 Company Name: Chemical Waste Management — 6. US EPA ID Number: ILD000806604

C. Illinois Transporter's ID: 0075

D. (312) 396-1050 Transporter's Phone

7. Transporter 2 Company Name — 8. US EPA ID Number

E. Illinois Transporter's ID

F. ( ) Transporter's Phone

9. Designated Facility Name and Site Address: Trade Waste Incineration, 7 Mobile Ave., Sauget, Illinois 62201-1069 — 10. US EPA ID Number: ILD098642424

G. Illinois Facility's ID: 1 6 3 1 2 1 0 0 0 9

H. Facility's Phone: (618) 271-2804

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	HM	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. Paint Related Material, Combustible Liquid NA 1263	✓	3	DM	140	1	EPA HW Number D001; Authorization Number 090001
b. Carbon Tetrachloride (RQ 5000/2270) ORM-A UN 1846	✓	2	DM	100	1	EPA HW Number U211; Authorization Number 090001
c. Combustible Liquid NOS, Combustible Liquid NA 1993	✓	1	DM	50	1	EPA HW Number F001; Authorization Number 090001
d. Oil NOS. Combustible Liquid NA 1270 NON-HAZARDOUS		6	DM	330	1	EPA HW Number —; Authorization Number 090002

J. Additional Descriptions for Materials Listed Above.
3 drums paint — E64384
2 drums carbon tet E53175
1 drum solvent E64385
6 drums oil - E64395

K. Handling Codes for Wastes Listed Above In Item #14
1 = Gallons 2 = Cubic Yards

15. Special Handling Instructions and Additional Information
Avoid breathing fumes + skin contact

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, and Illinois regulations.

Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment.

GENERATOR

Printed/Typed Name	Signature	Date (Month Day Year)
George Kady	George Kady	02 19 87

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Date (Month Day Year)
STAFFORD SHAW		02 19 87

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Date (Month Day Year)

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.

Printed/Typed Name	Signature	Date (Month Day Year)
DIANE BALDOVSKI	Diane Baldovski	02 20 87

IN ILLINOIS: 217 / 782-3637 — 24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS* OUTSIDE ILLINOIS: 800 / 424-8802 or 202 / 426-2675

DISTRIBUTION: PART - 1 GENERATOR PART - 2 IEPA PART - 3 FACILITY PART - 4 TRANSPORTER PART - 5 IEPA PART - 6 GENERATOR

REV. #6

GENERATOR COPY – PART 1 - DO NOT REMOVE PART 1 FROM SET UNTIL COMPLETED.

This Agency is authorized to require, pursuant to Illinois Revised Statutes, Chapter 111½ Section 21, that this information be submitted to the Agency. Failure to provide the information may result in a civil penalty against the owner or operator of not to exceed $25,000 per day of violation. Falsification of this information may result in a fine up to $50,000 per day of violation and imprisonment up to 5 years. This form has been approved by the Forms Management Center.

12/30/86

Form A

GENERATOR NOTIFICATION TO TREATMENT FACILITY WHERE RESTRICTED WASTE REQUIRES TREATMENT PRIOR TO LAND DISPOSAL

Generator: Allied Corporation ILD005463344 Profile #: E64385

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If a generator determines he is managing a restricted waste and the waste requires treatment prior to land disposal, for each shipment of such waste, the generator must notify the treatment facility in writing of the appropriate treatment standard. This notification must include the information to be provided below.

1. EPA Hazardous Waste Number F001
2. CWMI Waste Material Profile Number E64384, E64385
3. Corresponding Treatment Standard (see REVERSE SIDE)
4. Manifest Number associated with this shipment of waste 1529030
5. Waste analysis data, where available (please attach)

I hereby certify that all information submitted in this and all associated documents is complete and accurate to the best of my knowledge and information.

PLEASE BE SURE TO CHECK THE APPROPRIATE BOX(ES) ON THE REVERSE SIDE BEFORE SIGNING.

Signed (authorized representative of generator) Title Date

Note: A copy of this Notice must accompany each manifested load as required by 40 CFR 268.7(a)(1).

CORRESPONDING TREATMENT STANDARD

Instructions: For each solvent waste constituent present in your waste shipment, check the appropriate box in front of the applicable treatment standard(s). If based upon best knowledge and information, your waste shipment may contain some or all of the solvent constituents listed below, please mark the appropriate box(es) or the box labeled "All of the above" at the bottom.*

Solvent Constituent	Treatment Standard (mg/l)			
	Wastewaters		All Other Wastes	
Acetone		0.05		0.59
n-Butyl alcohol		5.0		5.0
Carbon disulfide		1.05		4.81
Carbon tetrachloride		0.05		0.96
Chlorobenzene		0.15		0.05
Cresols		2.82		0.75
Cresylic acid		2.82		0.75
Cyclohexanone		0.125		0.75
1,2-Dichlorobenzene		0.65		0.125
Ethyl acetate		0.05		0.75
Ethyl benzene		0.05		0.053
Ethyl ether		0.05		0.75
Isobutanol		5.0		5.0
Methanol		0.25		0.75
Methylene chloride		0.20	X	0.96
Methylene chloride (from pharmaceutical industry)		12.7		0.96
Methyl ethyl ketone		0.05		0.75
Methyl isobutyl ketone		0.05		0.33
Nitrobenzene		0.66		0.125
Pyrdine		1.12		0.33
Tetrachloroethylene		0.079		0.05
Toluene		1.12		0.33
1,1,1-Trichloroethane		1.05		0.41
1,2,2-Trichloro-1,2,2-trifluroethane		1.05		0.96
Trichloroethylene		0.062	X	0.091
Trichlorofluoromethane		0.05		0.96
Xylene		0.05		0.15
All of the above*				

* Please note that where a generator's determination of the appropriate treatment standard is based upon his knowledge of the waste, the generator must maintain in his operating record all supporting data used to make this determination. See 51 Fed. Reg. at 40,597.

STATE OF ILLINOIS ENVIRONMENTAL PROTECTION AGENCY DIVISION OF LAND POLLUTION CONTROL

2200 CH[illegible]HILL ROAD, SPRINGFIELD, ILLINOIS 62706 (217) 78[illegible]61

IL532-0610

LPC 62 8/81

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) **EPA Form 8700-22 (3-84)** Form Approved. OMB No. 2000-0404. Expires 7-31-86

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. ILD005463344 Manifest Document No. 18 7009

2. Page 1 of 1

Information in the shaded areas is not required by Federal law, but is required by Illinois law.

3. Generator's Name and Mailing Address: Allied Corporation, #5 Brewer Road, Danville, IL. 61834-0013

4. Generator's Phone (217) 446-4700

A. Illinois Manifest Document Number IL 1529033

B. Illinois Generator's ID 1 83 30 40 0 0 2 7

5. Transporter 1 Company Name: Chemical Waste Management

6. US EPA ID Number: ~~ILD000806604~~

C. Illinois Transporter's ID 0 0 7 5

D. (312) 396-1685 Transporter's Phone

7. Transporter 2 Company Name

8. US EPA ID Number: ILD074202681 OK

E. Illinois Transporter's ID

F. ( ) Transporter's Phone

9. Designated Facility Name and Site Address: Trade Waste Incineration, 7 Mobile Ave, Sauget, IL. 62201-1069

10. US EPA ID Number: ILD098642424

G. Illinois Facility's ID 1 63 1 21 0 0 0 9

H. Facility's Phone (618) 271-2804

	11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	HM	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	Paint Related Material, Combustible Liquid NA 1263	✓	001	DM	00055	1	EPA HW Number D001; Authorization Number 090001
b.	Carbon Tetrachloride (RQ 5000/2270), ORM-A UN 1846	✓	006	DM	00330	1	EPA HW Number U211; Authorization Number 090001
c.							EPA HW Number; Authorization Number
d.							EPA HW Number; Authorization Number

J. Additional Descriptions for Materials Listed Above.

1 drum E64384 (waste paint)

6 drums E53175 (carbon tetrachloride)

K. Handling Codes for Wastes Listed Above In Item #14

1 = Gallons 2 = Cubic Yards

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, and Illinois regulations.

Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment.

GENERATOR

Printed/Typed Name: Gregory L. Barrett — Signature: Gregory L. Barrett — Date: Month Day Year 07 02 87

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name: CRAIG DOORNBOS DOUHE — Signature: Craig Doornbos — Date: Month Day Year 07 02 87

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name — Signature — Date: Month Day Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.

Printed/Typed Name: DIANE BALDOVSKI — Signature: Diane Baldovski — Date: Month Day Year 07 08 87

IN ILLINOIS: 217 / 782-3637 +24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS+ OUTSIDE ILLINOIS: 800 / 424-8802 or 202 / 426-2[illegible]75

DISTRIBUTION: PART - 1 GENERATOR PART - 2 IEPA PART - 3 FACILITY PART - 4 TRANSPORTER PART - 5 IEPA PART - 6 GENERATOR

REV #6

GENERATOR COPY – PART 1 - DO NOT REMOVE PART 1 FROM SET UNTIL COMPLETED.

This Agency is authorized to require, pursuant to Illinois Revised Statutes 1983, Chapter 111½ Section 21, that this information be submitted to the Agency. Failure to provide the information may result in a civil penalty against the owner or operator of not to exceed $25,000 per day of violation. Falsification of this information may result in a fine up to $50,000 per day of violation and imprisonment up to 5 years. This form has been approved by the Forms Management Center.

12/30/86

Form A

GENERATOR NOTIFICATION TO TREATMENT FACILITY
WHERE RESTRICTED WASTE REQUIRES TREATMENT PRIOR TO LAND DISPOSAL

Generator: Allied Corporation Profile #: E64384

This Notification is submitted to _____ in accordance with regulations effective November 8, 1986 to be promulgated at 40 CFR Section 268.7(a)(1). 40 CFR Section 268.7(a) requires the generator to test his waste or an extract developed using the Toxicity Characteristic Leaching Procedure (TCLP) described in Appendix I of Part 268 51 Fed. Reg. 40,643, or using knowledge of the waste to determine if the waste is restricted from land disposal.

EPA Hazardous Waste No. F001, F002, F003, F004, and F005 are "restricted wastes" and banned from land disposal effective November 8, 1986, unless one or more of the following conditions apply: (1) the generator of the solvent waste is a small quantity generator, (2) the solvent waste is generated from response action taken under CERCLA or corrective action taken under RCRA, or (3) the solvent waste is a solvent-water mixture, solvent-containing sludge or solvent-contaminated soil (non-CERCLA or RCRA corrective action) containing less than 1% (10,000 ppm) total F001-F005 solvent constituents listed in Table CCWE of Section 268.41. (This Table is reprinted on the reverse side).

If a generator determines he is managing a restricted waste and the waste requires treatment prior to land disposal, for each shipment of such waste, the generator must notify the treatment facility in writing of the appropriate treatment standard. This notification must include the information to be provided below.

1. EPA Hazardous Waste Number F003 - F005
2. CWMI Waste Material Profile Number E64384
3. Corresponding Treatment Standard (see REVERSE SIDE)
4. Manifest Number associated with this shipment of waste _____
5. Waste analysis data, where available (please attach) AT TW1

I hereby certify that all information submitted in this and all associated documents is complete and accurate to the best of my knowledge and information.

PLEASE BE SURE TO CHECK THE APPROPRIATE BOX(ES) ON THE REVERSE SIDE BEFORE SIGNING.

Signed (authorized representative of generator) Lab Supv. Title 7-2-87 Date

Note: A copy of this Notice must accompany each manifested load as required by 40 CFR 268.7(a)(1).

9149

CORRESPONDING TREATMENT STANDARDS

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Carbon tetrachloride		0.05		0.96
Chlorobenzene		0.15		0.05
Cresols		2.82		0.75
Cresylic acid		2.82		0.75
Cyclohexanone		0.125		0.75
1,2-Dichlorobenzene		0.65		0.125
Ethyl acetate		0.05		0.75
Ethyl benzene		0.05		0.053
Ethyl ether		0.05		0.75
Isobutanol		5.0		5.0
Methanol		0.25		0.75
Methylene chloride		0.20		0.96
Methylene chloride (from pharmaceutical industry)		12.7		0.96
Methyl ethyl ketone		0.05		0.75
Methyl isobutyl ketone		0.05		0.33
Nitrobenzene		0.66		0.125
Pyrdine		1.12		0.33
Tetrachloroethylene		0.079		0.05
Toluene		1.12	✓	0.33
1,1,1-Trichloroethane		1.05		0.41
1,2,2-Trichloro-1,2,2-trifluroethane		1.05		0.96
Trichloroethylene		0.062		0.091
Trichlorofluoromethane		0.05		0.96
Xylene		0.05	✓	0.15
All of the above*				

* Please note that where a generator's determination of the appropriate treatment standard is based upon his knowledge of the waste, the generator must maintain in his operating record all supporting data used to make this determination. See 51 Fed. Reg. at 40,597.

CONVERSATION RECORD

TIME:

DATE: 4-14-88

TYPE: ☐ VISIT ☐ CONFERENCE ☒ TELEPHONE ☐ INCOMING ☒ OUTGOING

Location of Visit/Conference:

NAME OF PERSON(S) CONTACTED OR IN CONTACT WITH YOU	ORGANIZATION (Office, dept., bureau, etc.)	TELEPHONE NO:
Karen Nelson	inspector IEPA	(217) 786-6892

ROUTING

NAME/SYMBOL	INT

SUBJECT: 4-5-88 land ban NOV - Allied Chemical Corp. ILD 005 463 344

SUMMARY

George Kady called her regarding the NOV.

He told her that TWI has made him submit a notice with each shipment and that this was a misunderstanding with her during the inspection.

Kady is to submit documentation to Region V and IEPA.

ACTION REQUIRED

NONE

NAME OF PERSON DOCUMENTING CONVERSATION	SIGNATURE	DATE
Ronald Brown	Ronald Brown	4-14-88

ACTION TAKEN

SIGNATURE	TITLE	DATE

Illinois Environmental Protection Agency · 4500 South 6th, Springfield, IL 62706

217/786-6892

RECEIVED
U.S. EPA, REGION V
WASTE MANAGEMENT DIVISION
OFFICE OF THE DIRECTOR

May 6, 1988

Refer to: LPC #18380400027 - Vermilion County
Allied Signal
ILD005463344
F-Solvent Land Ban

Mr. Ron Brown
Enforcement Section
U.S. Environmental Protection Agency
Region V
230 S. Dearborn Street
Chiacago, Illinois 60604

Dear Ron:

I am writing to you per Mr. George Kady's (of Allied-Signal) request and in reference to the Notice of Violation dated April 5, 1988 that was sent to Allied-Signal. You and I discussed this on April 14, 1988 over the telephone.

After discussing this subject with Mr. Kady on April 8, 1988 and reviewing Allied's response to the NOV, it appears that a misunderstanding occurred during the inspection. Allied apparently had been fulfilling the notification and determination of treatability standard requirements for their F-solvent land banned wastes at the time of the inspection.

If you wish to discuss this further, please call me at the above number.

Sincerely,

Karen S. Nelson

Karen S. Nelson
Environmental Protection Specialist
Land Field Operations Section
Division of Land Pollution Control

KSN/is

cc: DLPC/Division File
DLPC/FOS, Central Region
Don Phillips, Allied-Signal
George Kady, Allied-Signal

5HS-12

APR 05 1988

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. George Kady
Allied Chemical Corporation
P.O. Box 13
Danville, Illinois 61832

Re: Notice of Violation
Allied Chemical Corporation
ILD 005 463 344

Dear Mr. Kady:

On September 4, 1987, the Illinois Environmental Protection Agency (IEPA), representing the U.S. Environmental Protection Agency, conducted a Resource Conservation and Recovery Act (RCRA) inspection of the above-referenced facility. The purpose of the inspection was to determine the facility's compliance with the applicable hazardous waste management requirements of RCRA, including the Federal land disposal restrictions on F001-F005 spent solvents. The land disposal restrictions became effective on November 8, 1986, (40 CFR Part 268, and revisions to 40 CFR Parts 260-265 and 270-271).

With respect to the land disposal restrictions section of the inspection, your facility was found to be in violation of the following:

1. Failure to determine the appropriate treatability group of the waste as required by Section 268.41; and

2. Failure to provide a separate written notice attached to the manifest for each shipment of F-solvent wastes with the U.S. EPA hazardous waste numbers, the applicable treatment standards, manifest number, and waste analysis data, where available, as required by Section 268.7(a)(1).

A copy of the inspection report is enclosed for your records. Please submit to this office, within thirty (30) days of receipt of this Notice of Violation, documentation demonstrating that the above-cited violation has been corrected

and indicating what measures have been initiated to assure future compliance. Failure to correct the violations may subject the facility to further Federal enforcement action.

If you have any questions regarding this correspondence, please contact Mr. Ronald Brown of my staff at (312) 886-4463.

Sincerely yours,

Paul E. Dimock, Chief
IL/MI/WI Enforcement Section

Enclosure

cc: Harry Chappel, IEPA
Glenn Savage, IEPA

CONCURRENCES								
SYMBOL			acting	IL/MI/WI Section				
SURNAME	O.C	RBB	RBB					
DATE	3/31/88		3-31-88					

EPA Form 1320-1 (12-70) OFFICIAL FILE COPY

*U.S. GPO : 1984-436-836

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: December 14, 1987

SUBJECT: Allied Chemical Company, Danville, Il.
Class I Hazardous Waste Disposal

FROM: KIK
Krishna I Kamath, Petroleum Engineer

TO: Valerie Jones, John Taylor, Edward Watters
UIC Section

RECEIVED
8-25-88
IL. Section

As a Region V participant in the national survey of hazardous waste disposal ordered by the US Congress under the HSWA Act of 1984 and as a contributing author of the "Report to Congress on Injection of Hazardous Waste" (EPA 570/9-85-003, May 1985), I had occasion to review the recent operating history of the Acid disposal well operated by the Allied Chemical Company, Danville, Illinois. This company has been operating a packerless Class I hazardous waste disposal well since 1973. The circumstances of the operation of the well has resulted in the accumulation of (i) a "pool" of perhaps 50,000 gallons of carbon tetra chloride (Hazardous chemical #U-211) at depth of about 30 feet from the ground surface at the facility and (ii) a possible accumulation of 8,000 gallons of the heavy liquid at the bottom of the well. I have submitted the draft of a review report on the operation and the prevailing situation to the SDW branch chief, the UIC Section Chiefs and Unit Chiefs since 1954 and more recently to the Water Division Director, (copy attached).

Briefly, the Allied Chemical Company discovered in 1979, that their carbon terachloride storage tank had been leaking for an unknown period of time, and an unknown amount of the heavy (sp. gr. 1.59), sparingly water soluble (800 ppm at 70°F, 1000 ppm at 32°F) liquid had drained into the ground, and accumulated at a depth of about 30 ft. from the surface. The Illinois EPA, and the Allied Chemical Company, however, decided with consultant advice that the spill or seepage posed no threat to the groundwater. The IEPA also approved the remedial measure of pumping the liquid "oil" out of the shallow monitor wells on a regular basis and disposing it into the deep well. By May 1984, Allied had recovered and disposed of over 8,100 gallons of the liquid at the rate of approximately 2,000 gal/yr. Injection was discontinued soon after a Region V report indicated the possibility of blowouts of wells injecting hydrochloric acid waste into dolomite

formations. Such a blowout had occured in the Cabot Corporation well, Tuscola, Illinois, which is operationally and geologically similar to the Allied well.

It appears that Allied has so far recovered about 15,000 gals. of the liquid. It follows from the theory of two-phase liquid flow through porous media (as applied to crude oil recovery) that only a third of the oil can be recovered by pumping from a pool of carbon tetrachloride containing the oil trapped in the gravel and sand aquifer at the Allied property. It is thus possible to estimate roughly, that the pool still contains about 30,000 or more gallons of the liquid which must remain unrecoverable by currently available methods. The shallow accumulation of the sparingly water soluble liquid, is therefore, subject to being continuously leached out for an indefinite period of time by recharge water, and introduced into the shallow aquifer systems. This eventuality does not appear to have been anticipated and considered by the Company, the IEPA or the Consultant (Geraghty and Miller) when the spill was first unexpectedly discovered in 1979. A re-evaluation of the impact of the accumulation on the health of the local populace and perhaps in nearby Indiana, only a mile and half to the east, is perhaps appropriate at this time.

A citizens environmental group, ("Danville Citizens Group for the Control of Hazardous Waste Injection") has recently been formed to protest underground waste disposal by Allied, and has been gathering data on the Allied well operation. I anticipate that a review of the entire incident by EPA (RCRA or UIC) may result from its efforts in this matter. It is also my feeling that the public is not, as yet, aware of the surface spill of carbon tetrachloride at the Allied facility. I would not have been aware of the spill myself, and persued the subject, had it not been for the report filed by Allied in 1983 (EPA Form 8700-13A) indicating that their injectate consisted of waste hydrochloric and hydrofluoric acids as well as "contaminated carbon tetrachloride".

I anticipate another problem for the UIC Section Land Ban Group and Allied in evaluating the hydrogeologic model of the injection well operation: the complication posed by a small pool of the heavy, sparingly water soluble nonpolar liquid at or around the bottom of their well.

cc. J. Chiu, S. Burton, R. Traube

→ Joe Boyle - FFI

WEM
12-15-87

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

11 DEC 1987

REPLY TO THE ATTENTION OF:

RECEIVED
U.S. EPA, REGION 5
WASTE MANAGEMENT DIVISION
OFFICE OF THE DIRECTOR

MEMORANDUM

FROM: Thomas Daggett - TD 8/FN6
Chief, SWERB Section II

TO: Bill Muno, Chief
RCRA Enforcement Section
Mike Smith, Chief, A.W.T.G.L. Branch

RE: Hall v. Allied Signal & Rogers Cartage
Notice of Citizen Suit, RCRA 7002(c)

The attached notice of a citizen suit has made its way to me. The notice indicates the Halls will file a citizen suit under RCRA § 7002 after December 26, 1987, unless we (or Illinois) does so first.

Note that, by its terms, this notice, required by § 7002(c), relates to a suit against two private corporations allegedly in violation of RCRA, not against EPA for failure to perform a non-discretionary act. However, the cited Section § 7002 allows suits against "any person", including the Government, for failure to act. Thus, there exists some concern that EPA could be the subject of the suit.

I have assigned Felipe Gomez (6-6833) to handle the matter for ORC.

cc: Schaefer
Ullrich
Elam
Radell

RECEIVED
U.S. EPA, REGION 5
WASTE MANAGEMENT DIVISION
OFFICE OF THE DIRECTOR

Close

LAW OFFICES
RICHARD W. COSBY
208 SOUTH LA SALLE STREET
SUITE 1973
CHICAGO, ILLINOIS 60604

312 • 263-7180

RECEIVED
OCT 26 1987
U. S. EPA REGION 5
OFFICE OF REGIONAL ADMINISTRATOR

October 23, 1987

O. ORC
CC: RF
WMD
RA

REGISTERED MAIL - RETURN RECEIPT REQUESTED

Mr. Edward J. Boling
President
Allied Signal, Inc.
c/o CT Corporation System
Registered Agent
208 S. LaSalle Street
Chicago, Illinois 60604

CT Corporation System
Registered Agent for
Allied Signal, Inc.
208 S. LaSalle Street
Chicago, Illinois 60604

Mr. Robert P. Johnson
President
Rogers Cartage Company
c/o Joseph Larem, Registered Agent
10735 South Cicero
Oak Lawn, Illinois

Mr. Joseph Larem
Registered Agent for
Rogers Cartage Company
10735 South Cicero
Oak Lawn, Illinois

Mr. Valdas V. Adamkus
Regional Administrator
United States Environmental Protection Agency
230 South Dearborn Street
16th Floor
Chicago, Illinois 60604

Mr. Richard J. Carlson
Director
Illinois Environmental Protection Agency
2200 Churchill Road
Springfield, Illinois 62706

Gentlemen:

Pursuant to Section 7002(c) of the Resource Conservation and Recovery Act of 1976, as amended, 42 USC Section 6972(c) (hereinafter sometimes the "Act") and the regulations adopted thereunder, 40 CFR Part 254, Randy Hall and Susan J. Hall, both individually and on behalf of their children Amber, Charles Justin, and Elizabeth Ward, by their attorney, hereby give notice that they will commence a civil action in their own behalf against Allied Signal, Inc. and Rogers Cartage Company for violations of the Act and regulations adopted pursuant to the Act. Such action will be commenced no less than sixty (60) days after this notice unless the Regional Administrator of the United States Environmental Protection Agency, Region V or the State of Illinois has commenced and is then diligently prosecuting an action in an appropriate court to require compliance with the Act and regulations adopted pursuant to the Act.

In particular Allied Signal, Inc. has disposed of certain hazardous wastes including, but not limited to, carbon tetrachloride at its refrigerant and propellant gas manufacturing facility on Brewer Road, Danville, Vermilion County, Illinois (ILD #005463344) in a manner which has allowed the hazardous wastes to enter and contaminate the groundwater flowing beneath the facility. Said contaminated groundwater has left, and is leaving, Allied Signal, Inc.'s facility, has migrated, and threatens to migrate in a northwesterly direction to the property of Susan J. and Randy Hall and has entered and is entering, the basement of their residence and has contaminated and is contaminating, the interior atmosphere of their house.

In addition to the groundwater contamination caused by Allied Signal, Inc., groundwater has been contaminated by hazardous wastes generated by past truck cleaning operations of Rogers Cartage Company whose facility is immediately south of Susan J. and Randy Hall's residence on Brewer Road in Danville, Vermilion County, Illinois. Groundwater contaminated by hazardous wastes generated by Rogers Cartage Company has migrated through a former underground tile system in a northerly direction through the Halls' property has contaminated the soil around their basement, and hazardous constituents from past truck cleaning operations leach into their basement and contaminate the interior atmosphere of their house.

The violations set forth above have occurred from at least 1980 and will continue until abated.

The full name and address of the persons giving this notice are:

Randy and Susan J. Hall, both
individually and on behalf of
their children
27 North Alexander
Danville, Illinois 61832

Richard W. Cosby
One of Their Attorneys

cc: Administrator
Environmental Protection Agency

Joe Boyle - FYI

RECEIVED
OCT 27 1987
U.S. EPA, REGION V
WASTE MANAGEMENT DIVISION
OFFICE OF THE DIRECTOR

RECEIVED
OCT 26 1987
U. S. EPA REGION 5
OFFICE OF REGIONAL ADMINISTRATOR

LAW OFFICES
RICHARD W. COSBY
208 SOUTH LA SALLE STREET
SUITE 1973
CHICAGO, ILLINOIS 60604
312 • 263-7180

October 23, 1987

O. ORC
CC: RF
WMD
RA

REGISTERED MAIL - RETURN RECEIPT REQUESTED

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President
Rogers Cartage Company
c/o Joseph Larem, Registered Agent
10735 South Cicero
Oak Lawn, Illinois

Mr. Joseph Larem
Registered Agent for
Rogers Cartage Company
10735 South Cicero
Oak Lawn, Illinois

Mr. Valdas V. Adamkus
Regional Administrator
United States Environmental Protection Agency
230 South Dearborn Street
16th Floor
Chicago, Illinois 60604

Mr. Richard J. Carlson
Director
Illinois Environmental Protection Agency
2200 Churchill Road
Springfield, Illinois 62706

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Allied Signal, Inc.
Rogers Cartage Company, et al.
October 23, 1987

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Randy and Susan J. Hall, both
individually and on behalf of
their children
27 North Alexander
Danville, Illinois 61832

Richard W. Cosby
One of Their Attorneys

cc: Administrator
Environmental Protection Agency

RESPONSE TO 1/30/87 CL.

ALLIED

Allied Corporation
P.O. Box 13
Danville, IL 61832
Telephone (217) 446-4700

February 13, 1987

Harry A. Chappel, P.E., Acting Manager
Facilities Compliance Unit
Compliance Monitoring Section
Illinois Environmental Protection Agency
Division of Land Pollution Control
2200 Churchill Road
Post Office Box 19276
Springfield, Illinois 62794-9276

RECEIVED
FEB 17 1987
IEPA-DLPC

SUBJECT: SECTION 39 (h), ILLINOIS ENVIRONMENTAL PROTECTION ACT

Dear Mr. Chappel:

Per your letter of January 30, 1987, please be advised that Allied Corporation, Danville Works has not requested IEPA special authorization for the continued operation of the on-site injection well per section 39(h). Based on our review of 39 (h) and the legislative record it is our position that injection wells are not subject to 39 (h) and therefore we have not submitted a subject request to the Agency.

As you know the Illinois Pollution Control Board's position, as stated in their emergency rule, specifically excluded injection wells from the requirements of 39 (h). Consistent with that reasoning Allied requested, by letter dated October 20, 1986, an extension for submitting a "request for authorization" pending final outcome of the then proposed emergency rule. As you know, the subject emergency rule was recently vacated by the Appellate Court. The ruling was limited to the Pollution Control Board's ability to adopt an "emergency rule" in this instance. Per the appeal, it remains apparent to us that injection wells continue to be excluded from 39 (h) requirements. However in light of the absence of a final rule on this matter we hereby submit a request for authorization per your request.

Please contact me if you have any questions.

Sincerely,

Richard L. Purgason

Richard L. Purgason
Plant Manager

RLP:cm

34

Request for Authorization to Deposit
Hazardous Waste in a Disposal Facility
(To be Completed by the Generator)

Name: Allied Corporation
Address: P. O. Box 13
City: Danville State: Illinois Zip: 61834-0013

Contact Person: Richard Purgason Generator Code: ILD 005463344
Phone: 217-446-4700 SIC: 2869

Note: This form must accompany a special waste stream application form.

Sec. 39 (H) of the Environmental Protection Act states: "The Agency may grant specific authorization for the disposal of hazardous waste streams only after the generator has reasonably demonstrated that, considering technological feasibility and economic reasonableness, the hazardous waste cannot be reasonably recycled for reuse, nor incinerated or chemically, physically or biologically treated so as to neutralize the hazardous waste and render it nonhazardous".

Please provide a full and complete response to each of the following. The burden of proof is on the generator to demonstrate that he cannot recycle, incinerate, or treat his waste. Thus, the Agency is not requiring that any specific steps be taken (e.g. process changes to recycle the waste) but if certain measures have been or will be taken then they must be identified to the Agency if the generator is to get credit for them. The generator should consider technological feasibility and economical reasonableness in completing responses. (NOTE: failure to fully discuss all of the following may result in denial of this application):

WASTE DESCRIPTION/DISPOSAL METHOD

Danville Works generates 20 to 25 million gallons of process waste water per year. This waste generally consists of water (80% - 98%), hydrochloric acid (<1% to 20%), hydrofluoric acid (<1%), salts (<15%), metals (<1%) and small amounts of organic materials (<.1%). The flash point is >212°F. The sources of this waste water include cooling tower blowdowns, boiler blowdowns, softener backflushes, rainwater, HCl and HF vent scrubber solutions, spent caustic, surplus HCl and equipment washings. This waste water is hazardous based on corrosivity (D002) and EP toxicity for arsenic (D004) and is disposed via an on-site injection well. Essentially no solids are present since this waste water if filtered through 100 micron filters prior to injection. The injection well is used solely for disposal of the on-site generated waste water. See Attachment I for specific analytical results.

I. Why can this waste not be recycled for reuse? Please respond to the following items:

1. Describe any steps taken or to be taken to internally reuse waste streams such as rinses, cleaning solvents, etc.

This waste stream is comprised of various sources which are spent, contaminated or unsalable products. Based on their compositions and the plant requirements, this waste stream cannot be internally reused.

I. Why can this waste not be recycled for reuse? Please respond to the following items:

2. **Describe the measures taken to reduce the hazardous waste generated through improved housekeeping.**

Since the waste is a liquid, it is fully contained to the extent practicable within closed systems. This waste stream is generated from boiler blowdowns, cooling tower blowdowns, air pollution control scrubber solutions etc. It is not generated from poor housekeeping. Therefore this question is not applicable to the generation of this waste stream.

3. **Describe any changes made to the process to reduce the hazardous waste generated through the use of different raw or intermediate materials.**

This waste stream is considered hazardous for corrosivity and EP toxicity for arsenic. Arsenic enters the plant process as a contaminant in the raw material, HF, as the result of a natural contaminant in the fluorspar which is used to manufacture HF. The use of a different raw material to reduce the hazardous wastes generated by this process is not technically feasible. Although the utilization of arsenic free HF as a raw material would reduce the arsenic concentration of the waste water, the availability of low arsenic HF is extremely limited and not practically available for the plant operation at this time. Allied is currently conducting research to address the arsenic contamination associated with HF.

4. **Describe any measures taken to reduce the hazardous waste generated by separating waste streams into components - either characteristic from listed, or hazardous from non-hazardous.**

Although the components of this waste stream may, in part, be separated into hazardous and non-hazardous streams, it would not result in a reduction the amount of waste generated or aid in recycling the hazardous waste. Because of contaminants in each would be stream (hazardous and non-hazardous) reuse or recycle of these streams is not practical. See the response to question #5 below for more details.

5. **What equipment or other process changes have been or can be made to reduce or recycle hazardous waste.**

This waste stream is largely comprised of water. Due to the other components of this waste (HCl, As, etc.) and the fact that "fresh" water is readily available as a resource, little if any, markets exist which would warrant recycling this material.

In part, the RCRA hazardous components of this waste stream can be reduced via neutralization. With IEPA approval, an elementary neutralization facility is planned for installation in 1987. By treating the waste water to a pH of 4 to 10, the corrosivity characteristic of this waste stream will be eliminated.

(Cont.) I. Why can this waste not be recycled for reuse? Please respond to the following items:

(Cont.) 6. Describe any other measures, such as contacting the Industrial Materials Exchange Service (IMES), that have been taken.

(NOTE: Even though a 100% recycling or reuse of waste cannot be achieved, a significant effort which nonetheless achieves less could be found to be reasonable.)

Beyond the neutralization proposal, no additional measures have been taken to recycle or reuse this waste.

II. Why can this waste not incinerated?

Please respond to the following items:

1. Is the waste incinerable?

Due to the large volume and water content of this waste stream, for all practical purposes, it cannot be incinerated. Additionally, incineration would not eliminate the acids, arsenic, or salts as they would not be decomposed by incineration.

2. Is this waste listed solely due to the presence of organic substances (i.e., certain "U", "P", "F", or "K" listed wastes?)

No, this waste is hazardous based on corrosivity and EP toxicity for arsenic.

3. Is the waste hazardous only due to the characteristic of ignitability?

No. This waste is hazardous based on corrosivity and EP toxicity for arsenic.

III. Why can this waste not be chemically, physically, or biologically treated so as to neutralize the hazardous waste and render it non-hazardous?

Please respond to the following items:

1. Is this waste a treatment residual? (If yes describe the treatment system.)

No

(Cont) III. Why can this waste not be chemically, physically, or biologically treated so as to neutralize the hazardous waste and render it non-hazardous?

Please respond to the following items:

(Cont) 2. Does this waste contain hexavalent chromium? If yes, describe how the waste is or will be treated so as to reduce the chromium to the trivalent state.

This waste stream does not contain hexavalent chromium at EP toxic levels.

3. Is this waste listed due to the presence of cyanide? If yes, describe how the waste is or will be treated to destroy cyanide.

No

4. Is the waste considered hazardous only because it exibits the characteristics of a hazardous waste? If yes, describe any measures taken to render the waste non-hazardous by treating it.

Yes, it is hazardous for corrosivity and EP toxicity for arsenic. Currently no measures have been taken to render the waste non-hazardous by treating it. However, the installation of a neutralization facility is planned for 1987. Barring any unforeseen difficulties, with this installation and IEPA approval, this waste water will be neutralized to a pH of 4 to 10 by year end.

Regarding arsenic treatment, several theoretical approaches to arsenic removal are currently being examined however, no large scale technically feasible methods of arsenic removal has yet been developed.

5. Is the waste "listed" as hazardous because of the presence of heavy metals? If yes, describe how the waste can be treated so as to reduce the leachability of any heavy metals (i.e. to levels below their respective "E.P. Toxicity Limits")?

(NOTE: Even though it may not be possible to treat the waste so as to render it completely non-hazardous, treatment which renders the waste significantly less hazardous could be approved as required under Section 39 (h) of the Act.)

This waste is not considered a "listed" hazardous waste. It is solely a "characteristic" hazardous waste.

IV. Additional information - please respond by discussing the following:

1. Is this waste the result of a spill cleanup?

   No

2. Does the waste result from the closure of a hazardous waste facility? (If yes, identify the date of closure plan approval.)

   No

3. Does this waste result from the clean-up of a CERCLA, or otherwise abandoned, site?

   No

4. Is this waste permitted or authorized (or is application presently being made) to go to any other solid waste management facilities? (If yes, identify facilities, and appropriate permit number.)

   No

5. If this waste is a pollution control residual, subject to other permitting requirements please indicate the type of requirement, appropriate permit or authorization number, and issuing agency:

   Air Pollution Control:

   Water Pollution Control - Pretreatment:

   Solid Waste Control:

   Other:

   (Attach additional pages as necessary)

   This waste stream contains HCl and HF scrubber solutions. These solutions are generated as the result of the operation of plant air pollution control equipment. This equipment is permitted by the Illinois Environmental Protection Agency, Air Pollution Control Division. The plant site ID# is 183020AAF.

(CONT.) IV. Additional information - please respond by discussing the following:

(Cont) 6. Commercial treatment facilities should identify all of the waste stream types (by hazardous waste code) which they are treating and demonstrate that all major constituents of each waste type are being treated.

This site is not a commercial treatment facility.

V. Certification and signature by authorized representative of generator

Certification: I certify that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete.

Signature: Richard A. Langan Date: Feb 13, 1987

Title: PLANT MANAGER

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND POLLUTION CONTROL
CHEMICAL ANALYSIS FORM

AGENCY USE ONLY

Page 1 of 2

RECORD CODE: LPCSM01 (1-7) | TRANS CODE: A (8)

FEDERAL ID NUMBER: ILD005463344

REPORT DUE DATE: 36 M 1 D 1 Y 41

SITE INVENTORY NUMBER: 1 9 3 8 0 4 0 0 2 7 (9-18)

MONITOR POINT NUMBER (see Instructions): X201 (19-22)

REGION: C CO: VERMILION

DATE COLLECTED: 23 M 07 D 25 Y 84

DANVILLE / ALLIED CHEMICAL
LOCATION / RESPONSIBLE PARTY

IEPA LAB (x or Blank) (see Instructions): X (29)

FOR IEPA USE ONLY

COMPLAINT NO.: _____ (30-35)

DATE RECEIVED: 42 M 10 D 09 Y 47 (42-47)

SAMPLING PURPOSE CODE (see Instructions): 4 (48)

TIME CARD PROGRAM CODE: L P 4 5 (49-52) & UNIT CODE: L (53)

BACKGROUND SAMPLE (X): 54

TIME COLLECTED (24 HR CLOCK): 55 H 08 M 45 (55-58)

UNABLE TO COLLECT SAMPLE (see Instructions): 59

MONITOR POINT SAMPLED BY (see Instructions): R (60) OTHER (SPECIFY)

SAMPLE FIELD FILTERED - INORGANICS (X): 61 ORGANICS (X): 62

RECEIVED
OCT 17 1984
ENVIRONMENTAL PROTECTION AGENCY
STATE OF ILLINOIS

SAMPLE APPEARANCE: 63 CLEAR, NO ODOR

COLLECTOR COMMENTS: 103

SPECIAL INSTRUCTIONS TO LAB:

COLLECTED BY	INITIALS	DIVISION OR COMPANY	TRANSPORTED BY	DIVISION OR COMPANY
D. Ebenberger	S D E (133-135)	DLPC	R. Herseman	DLPC

LAB USE ONLY

LAB SAMPLE NO.: B003632

LAB NAME AND ADDRESS: ~~ENVIRONMENTAL PROTECTION AGENCY~~ Division of Laboratory Services, 2125 South First Street, Champaign, Illinois 61820

LAB ID NO.: 0003 (146-149)

DATE RECEIVED: JUL 25 1984

TIME RECEIVED: 11:50 Am

SAMPLE TEMP OKAY (Y/N): Y

SAMPLE PROPERLY PRESERVED (Y/N): Y

DATE COMPLETED: _____

FORWARD: OCT 5 1984

LAB COMMENTS: 150

R. Frazier 199
SUPERVISOR SIGNATURE

RECORD CODE: LPCSM02 (1-7) | TRANS CODE: A (8) (Columns 9-29 from above)

FIELD MEASUREMENTS CONSTITUENT DESCRIPTION AND REQUIRED UNIT OF MEASURE		STORET NUMBER			< OR >	VALUE	REPORTING LEVEL	
DEPTH TO WATER (ft. below LS)	507F	72019 (15-19)	15	16	17	18-27	28	29
ELEVATION OF GW SURFACE (ft. ref MSL)	508F	71993						
TOTAL WELL DEPTH (ft. below LS)	509F	72008						
ALKALINITY TOTAL (mg/l as CaCO3) - Field	505F	00431						
REDOX POTENTIAL (millivolt) - Field	506F	00090						
pH (units) - Field	500F	00400				5.	1	4
SPEC CONDUCTANCE (umhos) - Field	503F	00094						
TEMP OF WATER SAMPLE (°C) - Field	502F	00010						

RECEIVED
OCT 09 1984
IEPA/DLPC

This Agency is authorized to require this information under Illinois Revised Statutes, 1979, Chapter 111 1/2, Section 1004 and 1021. Disclosure of this information is required. Failure to do so may result in a civil penalty up to $25,000 for each day the failure continues, $1,000.00 and imprisonment up to one year. This form has been approved by ...

H2

/DLPC CHEMICAL ANALYSIS FORM USE ONLY Page 2 of 2

RECORD CODE LPCSM02 (1–7) TRANS CODE A (8)

SITE INVENTORY NUMBER 183004002 7 (9–18) MONITOR POINT NUMBER X201 (19–22)

RE N C CO. VERMILION AQUEOUS LIQUIDS OTHER THAN GROUNDWATER

DANVILLE (LOCATION) ALLIED CHEM. (RESPONSIBLE PARTY)

DATE COLLECTED 07/25/84 (23 M, D, Y 28)

IEPA LAB (x or Blank) X (29)

LAB MEASUREMENTS CONSTITUENT DESCRIPTION AND REQUIRED UNIT OF MEASURE	STORET NUMBER			< OR >	VALUE	REPORTING LEVEL	
119T COD, MG/L (RECEIVED OCT 09 1984 IEPA-DLPC)	00335 (30–34)	35	36	37	30. (38–47)	48	49
100T PH, LAB - SU	00403				4.0		
103T ALKALINITY AS CACO3 MG/L	00410				234.		
111T AMMONIA NITROGEN, TOT MG/L	00610				0.25		
110T NITRITE + NITRATE, TOT MG/L	00630				6.8		
116T CYANIDE, TOTAL MG/L AS CN	00720				0.01		
160T SODIUM, TOTAL MG/L AS NA	00929				1500.		
108T CHLORIDE, MG/L AS CL	00940				1340.		
109T SULFATE, TOTAL MG/L AS SO4	00945				176.		
107T FLUORIDE, TOTAL MG/L AS F	00951				*		
144T ARSENIC, TOTAL UG/L AS AS	01002				37600.	3	L
145T BARIUM, TOTAL UG/L AS BA	01007			<	100.		
106T BORON, TOTAL UG/L AS B	01022	J					
146T CADMIUM TOTAL UG/L AS CD	01027			<	10.		
147T CHROMIUM, TOTAL UG/L AS CR	01034			<	10.		
149T COPPER, TOTAL UG/L AS CU	01042				50.		
150T IRON, TOTAL UG/L AS FE	01045				2800.		
151T LEAD, TOTAL UG/L AS PB	01051			<	50.		
152T MANGANESE, TOTAL UG/L AS MN	01055				380.		
154T NICKEL, TOTAL UG/L AS NI	01067				1600.		
156T SILVER, TOTAL UG/L AS AG	01077			<	5.		
157T ZINC, TOTAL UG/L AS ZN	01092				150.		
155T SELENIUM, TOTAL UG/L AS SE	01147				2.		
112T PHENOLS, TOTAL UG/L	32730				20.		
102T RESIDUE ON EVA.-180°C MG/L	70300				3700.	1	L
153T MERCURY, TOTAL UG/L AS HG -	71900				0.58		
SULFIDE mg/L				≤	0.04		
TDS					3970.		

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

SAMPLE NUMBER : D648167
SAMPLING POINT DESC. : VERMILION/DANVILLE/ALLIED CHEM X201

SUBMITTING SOURCE # : SITE # : 1838040027
DATE COLLECTED : 860612 TIME COLLECTED : 1000 SAMPLING PROGRAM :

COLLECTED BY : S DUSENBURG DELIVERED BY : S D
COMMENTS :
FUNDING CODE : LP45 AGENCY ROUTING : 00 UNIT CODE :
SAM TYPE CODE : SAMPLE PURPOSE CODE : 0

DATE RECEIVED : 860612 TIME RECEIVED : 1000 RECEIVED BY : R N
LAB OBSERVATIONS : 1GAL/2THM WATER REPORTING INDICATOR :
SUPERVISORS INITIALS : JTH NOTE : K = LESS THAN VALUE

P39340	LINDANE	UG/L :	.05K
P39410	HEPTACHLOR	UG/L :	.05K
P39330	ALDRIN	UG/L :	.05K
P39422	HEPTACHLOR EPOXIDE	UG/L :	.05K
P39348	ALPHA CHLORDANE	UG/L :	.05K
P39810	GAMMA CHLORDANE	UG/L :	.05K
P39380	DIELDRIN	UG/L :	.05K
P39390	ENDRIN	UG/L :	.05K
P39480	METHOXYCHLOR	UG/L :	.25K
P39327	O,P'-DDE	UG/L :	.05K
P39320	P,P'-DDE	UG/L :	.05K
P39315	O,P'-DDD	UG/L :	.05K
P39310	P,P'-DDD	UG/L :	.05K
P39305	O,P'-DDT	UG/L :	.05K
P39300	P,P'-DDT	UG/L :	.05K
P39516	TOTAL PCB'S	UG/L :	0.5K
P34418	CHLOROMETHANE	UG/L :	5.0K
P34413	BROMOMETHANE	UG/L :	5.0K
P39175	VINYL CHLORIDE	UG/L :	5.0K
P34311	CHLOROETHANE	UG/L :	5.0K
P34423	METHYLENE CHLORIDE	UG/L :	290
P34488	TRICHLOROFLUOROMETHANE	UG/L :	1600
P34501	1,1-DICHLOROETHYLENE	UG/L :	5.0K
P34496	1,1-DICHLOROETHANE	UG/L :	5.0K
P34546	TRANS-1,2-DICHLOROETHYLENE	UG/L :	5.0K
P32106	CHLOROFORM	UG/L :	390
P34531	1,2-DICHLOROETHANE	UG/L :	5.0K
P34506	1,1,1-TRICHLOROETHANE	UG/L :	5.0K
P32102	CARBON TETRACHLORIDE	UG/L :	1900
P32101	BROMODICHLOROMETHANE	UG/L :	9.0
P34541	1,2-DICHLOROPROPANE	UG/L :	5.0K
P34699	TRANS-1,3-DICHLOROPROPENE	UG/L :	5.0K
P39180	TRICHLOROETHYLENE	UG/L :	20
P78124	BENZENE	UG/L :	5.0K

SAMPLE NUMBER : D648167

[illegible]2105	DIBROMOCHLOROMETHANE	UG/L :	5.0
P34511	1,1,2-TRICHLOROETHANE	UG/L :	5.0K
P34704	CIS-1,3-DICHLOROPROPENE	UG/L :	5.0K
P34576	2-CHLOROETHYLVINYL ETHER	UG/L :	5.0K
P32104	BROMOFORM	UG/L :	5.0K
P34516	1,1,2,2-TETRACHLOROETHANE	UG/L :	5.0K
P34475	TETRACHLOROETHYLENE	UG/L :	5.0K
P78131	TOLUENE	UG/L :	5.0K
P34301	CHLOROBENZENE	UG/L :	5.0K
P78113	ETHYLBENZENE	UG/L :	5.0K
P81551	XYLENE	UG/L :	5.0K

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

SAMPLE NUMBER : D648168
SAMPLING POINT DESC. : DANVILLE BLANKS W/48167

SUBMITTING SOURCE # : SITE # : 1838040027
DATE COLLECTED : 860612 TIME COLLECTED : 1000 SAMPLING PROGRAM :

COLLECTED BY : S DUSENBURG DELIVERED BY : S D
COMMENTS :
FUNDING CODE : LP45 AGENCY ROUTING : 00 UNIT CODE :
SAM TYPE CODE : SAMPLE PURPOSE CODE : 0

DATE RECEIVED : 860612 TIME RECEIVED : 1000 RECEIVED BY : R N
LAB OBSERVATIONS : 2-40 ML VIALS REPORTING INDICATOR :
SUPERVISORS INITIALS : JTH NOTE : K = LESS THAN VALUE

P34418	CHLOROMETHANE	UG/L :	5.0K
P34413	BROMOMETHANE	UG/L :	5.0K
P39175	VINYL CHLORIDE	UG/L :	5.0K
P34311	CHLOROETHANE	UG/L :	5.0K
P34423	METHYLENE CHLORIDE	UG/L :	5.0K
P34488	TRICHLOROFLUOROMETHANE	UG/L :	5.0K
P34501	1,1-DICHLOROETHYLENE	UG/L :	5.0K
P34496	1,1-DICHLOROETHANE	UG/L :	5.0K
P34546	TRANS-1,2-DICHLOROETHYLENE	UG/L :	5.0K
P32106	CHLOROFORM	UG/L :	5.0K
P34531	1,2-DICHLOROETHANE	UG/L :	5.0K
P34506	1,1,1-TRICHLOROETHANE	UG/L :	5.0K
P32102	CARBON TETRACHLORIDE	UG/L :	5.0K
P32101	BROMODICHLOROMETHANE	UG/L :	5.0K
P34541	1,2-DICHLOROPROPANE	UG/L :	5.0K
P34699	TRANS-1,3-DICHLOROPROPENE	UG/L :	5.0K
P39180	TRICHLOROETHYLENE	UG/L :	5.0K
P78124	BENZENE	UG/L :	5.0K
P32105	DIBROMOCHLOROMETHANE	UG/L :	5.0K
P34511	1,1,2-TRICHLOROETHANE	UG/L :	5.0K
P34704	CIS-1,3-DICHLOROPROPENE	UG/L :	5.0K
P34576	2-CHLOROETHYLVINYL ETHER	UG/L :	5.0K
P32104	BROMOFORM	UG/L :	5.0K
P34516	1,1,2,2-TETRACHLOROETHANE	UG/L :	5.0K
P34475	TETRACHLOROETHYLENE	UG/L :	5.0K
P78131	TOLUENE	UG/L :	5.0K
P34301	CHLOROBENZENE	UG/L :	5.0K
P78113	ETHYLBENZENE	UG/L :	5.0K
P81551	XYLENE	UG/L :	5.0K

RECEIVED
FEB 17 1987

Illinois Environmental Protection Agency · 2200 Churchill Road, Springfield, IL 62706

217/782-6760

January 16, 1987

Mr. Charles H. Sutfin
Director, Water Division
U.S. Environmental Protection Agency
Region V - 5WD-13
230 South Dearborn Street
Chicago, IL 60604

Dear Mr. Sutfin:

Enclosed is a copy of the November 17, 1986 Hearing Officer's Summary of the Allied Chemical Company, Danville public hearing on the UIC Class I Well #1. The hearing was very well attended and many significant comments were received prior to and during the hearing. Three days prior to the public hearing, Allied Chemical Company proposed a plan to neutralize the waste. The technical details of the neutralization process are yet to be submitted by the company. The Allied Chemical Company has also proposed to keep the comment period open until January 12, 1987, which the IEPA agreed to.

The company and the concerned citizen groups are very interested in the way the final permit will be issued. To facilitate the flow of information to interested parties and the time needed for the IEPA to review the new information from the company and the citizens, the IEPA will try to issue the final permit decision on the Allied Chemical Company by February 28, 1987. Under the circumstances, I hope that your agency will adjust the first quarter FFY '87 SPMS commitments accordingly.

If you or your staff have any questions regarding this issue, please contact Rama Chaturvedi of my staff at 217/782-6762.

Respectfully,

William C. Child

William C. Child, Manager
Division of Land Pollution Control

WCC:RKC:tk:5/7/33

Enclosure

cc: William Radlinski
Bharat Mathur
Larry Eastep
Lynn Crivello, USEPA, Region V
UIC Adm. Record - Allied Chem. Co. Class I

33

Illinois Environmental Protection Agency · 2200 Churchill Road, Springfield, IL 62706

MEMORANDUM

RECEIVED
DEC 26 1986
EPA-DLPC

DATE: December 23, 1986

TO: Richard J. Carlson, Director

FROM: John Williams

SUBJECT: Hearing Officer's Report on the Matter of: Allied Chemical Corporation Permit Application for an Underground Injection Control (UIC) Well (#1) in Danville, Illinois, (Agency File 8128 Permit # UIC-003-WI-AC)

Name and Address of Applicant:
Allied Chemical Corporation
P.O. Box 13
Danville, Illinois 61832

Location of Facility:
Well #1 is located 454.04 feet north and 52.87 west of the SE corner of the SE quarter of the SW quarter of Section 12, Township 19 N, Range 11 West of the 3rd Principal Meridian.

County:
Vermilion

Division:
DLPC

ID Number:
UIC-003-WI-AC

Length of Permit:
Three years

Receiving Formations:
Eminence, Potosi, and Upper Franconia

Classification of Well:
Class I

Application Date: June 20, 1985

Date of Notice of Public Hearing and Newspaper:
Danville Commercial News 10/30/86, 11/6/86 and 11/13/86.

Date Time and Place of Public Hearing:
Wednesday December 17, 1986, at 7:00 p.m. at Room 302, Vermilion County Courthouse, Danville, Illinois

Number Attending Hearing:
Approximately 104 citizens

Hearing Officer & Panel:
John Williams - Hearing Officer
Rama Chaturvedi - Panel Member
Steve Gobelman - Panel Member

Public Relations:
Greg Michaud

Proposed Date of Responsiveness Summary:
On or after March 30, 1987

Background:
The Applicant Allied Corporation whose facility is at Danville, Illinois is in the business of producing chlorofluorocarbons for use as refrigerent gases in coolers, chillers, and dispersing gases for a variety of other commercial uses. The facility has been operating an industrial waste injection well of Class I type since 1973.

The Allied Corporation will inject a maximum of 150 gallons per minute of liquid waste into the Eminence, Potosi, and Upper Franconia Formations. This liquid waste contains contaminated storm water, hydrochloric acid vent scrubber discharge, boiler blowdowns, cooling tower blowdowns, dilute waste softening equipment backflush, and waste hydrochloric acid. This waste water is stored at the facility in a rubber lined steel tank and a fiberglass tank. The waste will consist of the following key components and maximum concentrations:

a.	Hydrochloric Acid		4% by volume
b.	Hydrofluoric Acid		1% by volume
c.	Organic Material (T.O.C.)		200 mg/l
d.	Arsenic	Haz Waste Code #D004	500 mg/l

The operational requirements consist of a maximum injection pressure of 100 psig, annulus pressure of 250 + 25 psig, and injection rate of 150 gpm. The injected waste shall also consist of the following parameters:

Parameters			Range
a.	pH	Haz Waste Code #D002	0.1 to 8
b.	Temperature		50 to 80°F
c.	Specific Gravity		1.00 to 1.05

Agency Hearing:
The draft permit was publically noticed from August 15, 1986 to September 16, 1986 for public comments. Due to public opposition of the permit the Agency held a public hearing at 7:00 p.m. on Decmeber 17th, 1986, at the Vermilion County Courthouse in Danville, Illinois and approximately 106 citizens attended.

Prominent at the Hearing were:
William B. Black - State Representative for 105th District; Mary K. Mile, Margie Miller and Stephen Laker - County Board Health Committee; John Stephen Nealon - Illinois State Water Survey; John M. Hoagland - Danville Area Colleges; Michael Federman - City of Danville, Dept. of Planning; John L. Shaffer - Vermilion County ESDA; Vincent F. Koers - Danville Citizens for Control of Hazardous Waste Injection; Prof. John W. Foster - Dept. of Geology, Illinois State University; John Thompson - Central States Education Center, Champaign; Elmer R. Engelman - Resident Danville; Richard Purgason, George Kady - Allied Chemical (about forty Allied Chemical workers also attended); James Knoblauch WAND - WDNL T.V.; Bill Pickett WIRV Radio; Alan Trickle WCIA TV. The main concerns of the citizens were:

1) Ownership of Well. Mr. Vincent Koers, leader of a local citizens group has located a property deed which indicates that the Illinois Pollution Control Finance Authority owns the well, not Allied Chemical.

2) Financial liability. Residents near the site are concerned about the company's ability to fund a remedy for future environmental problems should bankruptcy be declared. Residents suggested a separate fund be established for this purpose.

3) Geologic Formation. Mr. Koers feels that Allied should extend the well into the Mt. Simon formation from its present depth in the Potosi formation. Professor John Foster, a geology professor at Illinois State University, presented comments at the hearing that the Potosi formation is not covered by an impermeable layer to prevent vertical migration of injected waste.

4) Groundwater Monitoring. Residents are concerned that they will not know if their private drinking water wells are contaminated unless a network of monitoring wells are drilled and sampled on a frequent basis.

5) Closure. Residents feel that adequate closure requirements for this well have not been documented in the permit application. There is allegedly an area of the well not properly cased which residents feel could become a problem once the well is no longer in operation.

Close of Record and Responsiveness Summary:
The Hearing Record will close on January 12, 1987 (originally it was to close on December 27, 1986, but the Applicant requested an extension of time date). The Responsiveness Summary is expected to be published on or after March 30, 1987.

The Agency will send its Responsiveness Summary to all those on its mailing list, and those who registered at the hearing and to anyone else requesting this.

JW:jd/1067g/19

cc: Del Haschemeyer
Roger Kanerva
Bernard Killian
Bill Child
Mike Collins
Joseph Svoboda
Cinda Schien
Gary King
Virginia Yang
Gloria Craven
Rama Chaturvedi
Steve Gobelman
Greg Michaud
Bob Casteel
Jill Withers
Bur Filson
David Jansen
Stafford Dusenberry
Ken Baumann
John Applegate

Illinois Environmental Protection Agency · 2200 Churchill Road, Springfield, IL 62706

217/782-6762

Refer to: 18380427 -- Vermilion County
Danville/Allied Corporation
ILD005463344

November 27, 1985

RECEIVED
12-2-85/10

Edith M. Ardiente, P.E.
Chief, Technical Program Section
U.S. Environmental Protection Agency
Region V
230 South Dearborn
Chicago, Illinois 60604

Dear Ms. Ardiente:

Enclosed is the Initial Screening for Environmental Significance form for the above referenced facility. Also enclosed are copies of the Notification of Hazardous Waste Site (EPA Form 8900-1) and the Preliminary Assessment (EPA Form 2070-12) for this facility.

If you have any questions regarding this initial screening, please contact Karen Nachtwey of my staff at 217/782-0892.

Very truly yours,

Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

LWE:KN:jd/2586E/15

Enclosure

cc: Division File
Bob Kuykendall
Bill Child
Bill Radlinski
Jodi Traub

CE1

RECEIVED
AUG 15 1985
IEPA-DLPC

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form A General Facility Standards

I. General Information

USEPA Number: I L D 0 0 5 4 6 3 3 4 4 IEPA Number: 1 8 3 8 0 4 0 0 2 7

Major Facility: YES/NO Notified As: G/TSD Regulated As: G/TSD

(A) Facility Name: Allied Chemical Co.

(B) Street: P.O. Box 13, Brewer Road

(C) City: Danville (D) State: IL (E) Zip Code: 61832

(F) Phone: 217/446-4700 (G) County: Vermilion

(H) Operator: Allied Chemical Co.

(I) Street: P.O. Box 13, Brewer Road

(J) City: Danville, (K) State: IL (L) Zip Code: 61832

(M) Phone: 217/446 4700 (N) County: Vermilion

(O) Owner: Allied Corporation

(P) Street: Columbia Road and Park Avenue

(Q) City: Morristown (R) State: New Jersey (S) Zip Code: 07960

(T) Phone: 201/445-2000 (U) County: --

Region: ___ (V) Date of Inspection: 7 / 30 / 85 (W) Time: (From) 10:30AM (To) 3:15 PM

Type of Inspection: ISS RECORD REVIEW SAMPLING CITIZEN COMPLAINT
CLOSED WITHDRAWAL OTHER PART B
F/U ____/____/____ (Date of Initial Inspection)

(X) Weather Conditions: 75° - Cloudy, Dry

Area	Section	Class I	Class II
	TOTAL Class I's & II's	0	0

(AA) Preparer Information

Name
David C. Jansen
David C Jansen

Agency/Title
IEPA/EPS IV

Telephone
217/786-6892

TT. 532-1343

(Y) Person(s) Interviewed	Title	Telephone
George Kady	Supv., Safety & Pollution Control	217/446-4700

(Z) Inspection Participants	Agency/Title	Telephone
David C. Jansen	IEPA/EPS IV	217/786-6892

II. Section A: Scope of Inspection.

1. Interim Status standards for the treatment, storage or disposal of HAZARDOUS WASTES SUBJECT TO 35 Ill. Adm. Code 725.101. Complete Inspection Form A, Sections B, C, D, E, and G.

2. Place an "X" in the box(es) corresponding to the facility's treatment, storage or disposal processes, and generation and/or transportation activity (if any). Complete only the applicable sections and appendixes.

Permit application process(es) (EPA Form 3510-3)			Inspection Form A section(s)
S01	[X]	storage in containers	I
S02	[X]	storage in tanks	J
T01	[ ]	treatment in tanks	J
S04	[ ]	storage in surface impoundment	K, F
T02	[ ]	treatment in surface impoundment	K, F
D83	[ ]	disposal in surface impoundment	K, F
S03	[ ]	storage in waste pile	L
D81	[ ]	disposal by land application	M, F
D80	[ ]	disposal in landfill	N, F
T03	[ ]	treatment by incineration	O, P
T04	[X]	treatment in devices other than tanks, surface impoundments, or incinerators Process not employed since 1982	Q

Other Activities

GENERATOR	[X]	APPENDIX	GN
TRANSPORTER	[ ]	APPENDIX	TR

3. Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.

4. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 35 Ill. Adm. Code 725.101(c). Provide a brief rationale for the possible exclusion.

(D79) Deep well injection permitted under UIC program, exempted per 725.101(c)(2).

III. GENERAL FACILITY STANDARDS:
(Part 265 Subpart B)

35 Illinois Administrative Code (35 IL. A. C.) Part 725 Subpart B)

	Yes	No	NI*	Remark
(A) Has the Regional Administrator been notified regarding:				
1. Receipt of hazardous waste from a foreign source?	___	___	___	Does Not Apply (DNA)
2. Facility expansion?	___	___	___	DNA
(B) General Waste Analysis:				
1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	X	___	___	
2. Does the owner or operator have a detailed waste analysis plan on file at the facility?	X	___	___	
3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	___	___	___	DNA
(C) Security - Do security measures include: (if applicable)				
1. 24-Hour surveillance?	X	___	___	
2. Artificial or natural barrier around facility?	X	___	___	
3. Controlled entry?	X	___	___	
4. Danger sign(s) at entrance?	X	___	___	
(D) Do Owner or Operator Inspections Include:				
1. Records of malfunctions?	___	___	___	No Malfunctions
2. Records of operator error?	___	___	___	No errors
3. Records of discharges?	___	___	___	No discharges

*Not Inspected

III. GENERAL FACILITY STANDARDS:
(Part 265 Subpart B)

35 Illinois Administrative Code (35 IL. A. C.) Part 725 Subpart B)

	Yes	No	NI*	Remark
(A) Has the Regional Administrator been notified regarding:				
1. Receipt of hazardous waste from a foreign source?	___	___	___	Does Not Apply (DNA)
2. Facility expansion?	___	___	___	DNA
(B) General Waste Analysis:				
1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	X	___	___	
2. Does the owner or operator have a detailed waste analysis plan on file at the facility?	X	___	___	
3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	___	___	___	DNA
(C) Security - Do security measures include: (if applicable)				
1. 24-Hour surveillance?	X	___	___	
2. Artificial or natural barrier around facility?	X	___	___	
3. Controlled entry?	X	___	___	
4. Danger sign(s) at entrance?	X	___	___	
(D) Do Owner or Operator Inspections Include:				
1. Records of malfunctions?	___	___	___	No Malfunctions
2. Records of operator error?	___	___	___	No errors
3. Records of discharges?	___	___	___	No discharges

*Not Inspected

	Yes	No	NI*	Remarks
4. Inspection schedule?	X			
5. Safety, emergency equipment?	X			
6. Security devices?	X			
7. Operating and structural devices?	X			
8. Inspection log?	X			
(E) Do personnel training records include: (Effective 5/19/81)				
1. Job titles?	X			
2. Job descriptions?	X			
3. Description of training?	X			
4. Records of training?	X			
5. Have facility personnel received required training by 5-19-81?	X			Have certificates of training for RCRA and other safety topics
6. Do new personnel receive required training within six months?	X			
(F) If required are the following special requirements for ignitable, reactive, or incompatible wastes addressed?				
1. Special handling?	X			
2. No smoking signs?	X			
3. Separation and protection from ignition sources?	X			

*Not Inspected

IV. PREPAREDNESS AND PREVENTION:
(Part 265 Subpart C)

35 IL. A. C. Part 725 Subpart C

	Yes	No	NI*	Remarks
(A) Maintenance and Operation of Facility:				
Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?	X			None solely from current operations
(B) If required, does the facility have the following equipment:				
1. Internal communications or alarm systems?	X			Intercom & buzzer
2. Telephone or 2-way radios at the scene of operations?	X			2 way radios - telephones
3. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?	X			

Indicate the volume of water and/or foam available for fire control:

200,000 gal. water tank, city water

fire extinguishers, Halon units

(C) Testing and Maintenance of Emergency Equipment:				
1. Has the owner or operator established testing and maintenance procedures for emergency equipment?	X			
2. Is emergency equipment maintained in operable conditions?	X			
(D) Has owner or operator provided immediate access to internal alarms? (if needed)	X			

*Not Inspected

	Is there adequate aisle space for unobstructed movement?	X			

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES:
(Part 265 Subpart D)

35 IL. A. C. Part 725 Subpart D

(A) Does the Contingency Plan contain the following information:	Yes	No	NI*	Remarks
1. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.) (§725.151 & 725.156)	X			
2. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37? (§725.137)	X			
3. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?	X			
4. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?	X			
5. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)				Plan not necessary

*Not Inspected

	Yes	No	NI*	Remarks
(B) Are copies of the Contingency Plan available at site and local emergency organizations?	X			
(C) Emergency Coordinator				
1. Is the facility Emergency Coordinator identified?	X			~~George Kady~~
2. Is coordinator familiar with all aspects of site operation and emergency procedures?	X			
3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?				
(D) Emergency Procedures				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56? (725.156)				No emergencies to date

VI. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING
(Part 265 Subpart E)
35 IL. A. C. Part 725 Subpart E

	Yes	No	NI*	Remarks
(A) Use of Manifest System				
1. Does the facility follow the procedures listed in §265.71 for processing each manifest? (725.171)				DNA
2. Are records of past shipments retained for 3 years?				DNA
(B) Does the owner or operator meet requirements regarding manifest discrepancies?				DNA

*Not Inspected

(C) Operating Record

1. Does the owner or operator maintain an operating record as required in 265.73? (725.173)	X	___	___	___
2. Does the operating record contain the following information:				
**b. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in Appendix I?	X	___	___	___
c. The location and quantity of each hazardous waste within the facility?	X	___	___	Recorded in inspection logs
***d. A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)	___	___	___	DNA
e. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?	X	___	___	___
f. Reports detailing all incidents that required implementation of the Contingency Plan?	___	___	___	None needed to date
g. All closure and post closure costs as applicable? (Effective 5-19-81)	___	___	X	___

** See page 33252 of the May 19, 1980, Federal Register.

*** Only applies to disposal facilities

*Not Inspected

VII. CLOSURE AND POST CLOSURE
(Part 265 Subpart G)
35 IL. A. C. Part 725 Subpart G

	Yes	No	NI*	Remarks
(A) Closure and Post Closure				
1. Is the facility closure plan available for inspection by May 19, 1981?	X			
2. Has this plan been submitted to the ~~Regional Administrator~~ Director	X			
3. Has closure begun?		X		
4. Is closure estimate available by May 19, 1981?	X			
(B) Post closure care and use of property				
Has the owner or operator supplied a post closure monitoring plan? (effective by May 19, 1981)				DNA

VIII. FACILITY STANDARDS
(Part 265, Subparts I thru R)
35 IL. A. C. Part 725, Subparts I thru R

I
USE AND MANAGEMENT OF CONTAINERS

Facility Name: Allied Chemical Date of Inspection: 7/25/85

	Yes	No	NI*	Remarks
1. Are containers in good condition?	X			
2. Are containers compatible with waste in them?	X			
3. Are containers stored closed?	X			
4. Are containers managed to prevent leaks?	X			
5. Are containers inspected weekly for leaks and defects?	X			
6. Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive.)	X			

	Yes	No	NI*	Remarks
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.) (35 IL. A. C. 725.117 (b))	---	---	---	DNA
8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?	---	---	---	DNA

J
TANKS

Facility Name: Allied Chemical Date of Inspection: ---

	Yes	No	NI*	Remarks
1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank?	X	---	---	#34 is fiberglass #33, 40 are rubber lined steel.
2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?	X	---	---	Effluent collection sump
3. Do continuous feed systems have a waste-feed cutoff?	X	---	---	---
4. Are waste analyses done before the tanks are used to store a substantially different waste than before?	---	---	---	DNA
5. Are required daily and weekly inspections done?	X	---	---	---
6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	---	---	---	DNA
7. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.) (35 IL. A. C. 725.117 (b))	---	---	---	DNA

*Not Inspected

	Yes	No	NI*	Remarks

8. Has the owner or operator observed the National Fire Protection Association's buffer zone requirements for tanks containing ignitable or reactive wastes?

   Tank capacity: DNA gallons

   Tank diameter: DNA feet

   Distance of tank from property line DNA feet

   (See table 2 - 1 through 2 - 6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

K
SURFACE IMPOUNDMENTS

Facility Name: _____ Date of Inspection: _____

		Yes	No	NI*	Remarks
1.	Do surface impoundments have at least 60 cm (2 feet) of freeboard?				
2.	Do earthen dikes have protective covers?				
3.	Are waste analyses done when the impoundment is used to store a substantially different waste than before?				
4.	Is the freeboard level inspected at least daily?				
5.	Are the dikes inspected weekly for evidence of leaks or deterioration?				
6.	Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)				
7.	Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.) (35 IL. A. C. 725.117 (b))				

	Yes	No	NI*	Remarks
2. Has documented or written data been substituted for analysis of either:				
a. Lead?	___	___	___	_____
b. Mercury?	___	___	___	_____

B. List other parameters for which the waste is tested to enable owner or operator to establ steady state or determine the types of pollutants which may be emitted. (Note in Remarks any which you feel should be tested.)

		Remarks
1.	_____	_____
2.	_____	_____
3.	_____	_____
4.	_____	_____
5.	_____	_____

III. Monitoring and Inspections

	Yes	No	NI*	Remarks
A. Are combustion/emission control instruments monitored at least every 15 minutes?	___	___	___	_____
B. Is steady state maintained or corrections attempted?	___	___	___	_____
C. Is stack plume observed at least hourly for normal color and opacity?	___	___	___	_____
D. Did any stack observations made by owner or operator show a plume different than normal?**	___	___	___	_____
E. If yes to D above, were corrections made to return emissions to normal appearance?**	___	___	___	_____
F. Are the complete unit and associated equipment inspected daily for leaks, spills, and fugitive emissions?	___	___	___	_____
G. Are emergency shutdown controls and system alarms checked daily for proper operation?	___	___	___	_____

*Not Inspected
**Specify in Remarks for what period of time this was checked.

	Yes	No	NI*	Remarks
3. Has the owner or operator addressed the waste analysis requirements of 265.402? (725.502)	___	___	___	_____
4. Are inspection procedures followed according to 265.403? (725.503)	___	___	___	_____
5. Are the special requirements fulfilled for ignitable or reactive wastes?	___	___	___	_____
6. Are incompatible wastes treated? (If yes, 265.17(b) applies.) (725.117 (b))	___	___	___	_____

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutralize wastes which are hazardous only because they exhibit the corrosivity characteristic under 40 CFR §261.2 or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason

IX

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

1. MANIFEST REQUIREMENTS

	Yes	No	NI*	Remarks
(A) Does the operator have copies of the manifest available for review?	X	___	___	_____
(B) Do the manifest forms reviewed contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements)				
1. Manifest document number?	X	___	___	_____
2. Name, mailing address, telephone number, and EPA ID Number of Generator	X	___	___	_____

		Yes	No	NI*	Remarks
3.	Name and EPA ID Number of Transporter(s)?	X			
4.	Name, address, and EPA ID Number of Designated permitted facility and alternate facility?	X			
5.	The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	X			
6.	The total quantity of waste(s) and the type and number of containers loaded?	X			
7.	Required certification?	X			
8.	Required signatures?	X			
(C)	Does the owner or operator submit exception reports when needed?				None needed to date

2. PRE-TRANSPORT REQUIREMENTS

(A)	Is waste packaged in accordance with DOT Regulations? (Required prior to movement of hazardous waste off-site)	X			
(B)	Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required to movement of hazardous waste off-site)	X			
(C)	If required, are placards available to transporters of hazardous waste?	X			

UIC

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
Facility Inspection Form for Compliance with Underground Injection Control Requirements
(Permit and Inspection Fee Form)

Facility Name: ALLIED CHEMICAL

IEPA File Heading: DANVILLE / ALLIED CHEM

Facility Address. POST OFFICE BOX 13

IEPA I.D. Number: 1838040027

DANVILLE, IL 61832

County: VERMILION

217/446-4700

U.S. EPA I.D. No.: ILD005463344

Facility Contact: GEORGE KADY

Inspector(s) Name: BUR FILSON

Title: SUPERVISOR - SAFETY / POLLUTION CONTROL

OLPC / CMS

Well Name: ALLIED CHEMICAL WELL

Date of Inspection: 10/28/85

1. Well Classification

	Haz.	NH
Class I	X	X
Class II		
Class III		
Class IV		
Class V		

Time (From) 3:25 (To) 3:50

Comments: _____

2. Authorization

IEPA Permit: _____ Permit Number: _____

Authorization By Rule: X

Emergency Permit: _____ Permit Number: _____

Other: _____

3. Operational Status

Operating: _____

Standby: _____

Inoperable: X

Comments: WELL ~~HH~~ IS UNDERGOING MECHANICAL INTEGRITY TEST

10/28 - 10/31/85

	Yes	No	Value
4. Recording Devices			
a. Are continuous recording devices present/operating for: (730.113(b)(2))			
1. Injection Pressure*+	X		0
2. Injection Flow Rate*+	X		0
3. Volume*+	X		401529
4. Annulus Pressure*+	X		0
5. Temperature		X	
6. pH		X	
7. Other (specify) OUTER ANNULUS	X		0 psi
8. Other (specify) TANK 33	X		24 INCHES
TANK 34	X		15 INCHES
b. Are gauges present/operating for:			
1. Injection Pressure	X		0
2. Injection Flow Rate	X		0
3. Volume	X		401529
4. Annulus Pressure	X		0
5. Temperature	X		SEE COMMENTS
6. pH		X	
7. Other (Specify) CONDUCTIVITY	X		SEE COMMENTS
8. Other (Specify)	X		
c. Are all of the above operating within permitted ranges?	X		

Comments: TEMPERATURE @ 61° AT FILTERS, NO INJECTION TAKING PLACE DUE TO M.I. TEST BEING RUN. CONDUCTIVITY - ANODES PULLED FOR M.I. TEST

TANK 40 WAS EMPTY

*Required for Class I wells
+Required for Authorization by Rule

	Yes	No	Comment
5. Reporting Requirements			
a. Are reports submitted at least quarterly to the Agency on: (730.113(c))			
1. the physical, chemical and other relevant characteristics of the injection fluids+	X	___	REPORTS SUBMITTED MONTHLY
2. the monthly average, maximum and minimum values for injection pressure, flow rate and volume and annulur pressure+	X	___	REPORTS SUBMITTED MONTHLY
3. monitor well data+	___	___	N/A
b. Was the Agency notified within 24 hours of: (704.181(d))			
1. Any monitoring or other information which indicates that any contamination may cause an endangerment to a USDW+	___	___	N/A
2. Any noncompliance with a permit condition or malfunction of the injection system which may cause fluid migration into or between USDW's.+	___	___	N/A

Comments: _____

_____

_____

	Yes	No	Comment
6. Special Conditions			
a. Are all permit special conditions being met?	___	___	N/A

If no;
Explain: _____

_____

_____

. Pre-Injection Storage Facilities and Transmission Lines

a. Storage Facilities

1. Type of Storage
   A. Tanks X
   B. Surface Impoundments ____

	Yes	No	Comment
b. Condition of Storage Facility			
1. Is adequate freeboard being maintained?	X	____	____
2. Are the dikes maintained to prevent leaks?	____	____	N/A
3. Are the tanks maintained to prevent leaks?	X	____	____
4. Is there evidence of past leaks?	____	X	____
If so, what steps have been taken to correct and clean up the leak?			____

Comments: ____

	Yes	No	Comment
c. Tramission Lines			
1. Are transmission lines being maintained to prevent leaks?	X	____	____
2. Is there evidence of past leaks?	____	X	____
If so, what steps have been taken to correct and clean up the leak?			____

Comments: ____

Remarks: THE DEEPWELL AT ALLIED CHEMICAL IS UNDERGOING A MECHNICAL INTEGRITY TEST FROM OCTOBER 28 THROUGH OCTOBER 31, 1985. THE INJECTION TUBING WAS PULLED ON 10/28/85, WITH A TEMPERATURE LOG AND PRESSURE TEST OF THE CASING TO BE RUN ON 10/29/85. A NEW STRING OF INJECTION TUBING, WITH TWO SETS OF ANODES, WILL BE INSTALLED ON 10/30/85, AND A RADIOACTIVE TRACER SURVEY RUN EITHER 10/30 OR 10/31/85, AND THE BOTTOM OF THE WELL TAGGED. THE WELL IS ~~SCHEDULED~~ TO RETURN TO SERVICE ON 10/31/85.

:bls/0070E,sp

JUL 29 1985

5HS-13

CERTIFIED MAIL #P 246 373 001
RETURN RECEIPT REQUESTED

Richard L. Purgason, Plant Manager
Allied Chemical Company
Post Office Box 13
Danville, Illinois 61832

Re: Corrective Action Requirements,
Hazardous and Solid Waste
Amendments of 1984
Allied Chemical Company
ILD 005463344

Dear Mr. Purgason:

As you are aware, Illinois Environmental Protection Agency (IEPA) is currently evaluating your request for closure of the above referenced facility which is regulated under the Resource Conservation and Recovery Act (RCRA).

On November 8, 1984, the Hazardous and Solid Waste Amendments of 1984 (the Amendments) were enacted to amend RCRA. Under Section 206 and Section 233 (copies enclosed) of the Amendments, all facilities "seeking a permit" (taken to mean interim status facilities) must provide for corrective action for all releases of hazardous waste or constituents from any solid waste management unit, regardless of the time at which waste was placed in the unit. Please note that both hazardous and non-hazardous waste can meet the definition of solid waste under 40 CFR 261.2. Under the Cooperative Agreement with the United States Environmental Protection Agency (U.S. EPA), the State of Illinois has agreed to implement the corrective action requirements of the Amendments prior to the State getting formally authorized for the provisions of the Amendments.

Consequently, we must determine whether such releases have ever occurred at the facility site. If they have, we must ensure that corrective actions either have been taken, or will be taken, pursuant to a decision on your closure plan. An important part of our determination includes your willingness (or unwillingness) to sign the enclosed certification statement. Please read it carefully, and either sign it and return it, or return it to us unsigned with a cover letter of explanation, within three weeks of the date of this letter. Any tentative decision we make regarding releases of hazardous waste or hazardous constituents to the environment will be included in a public notice inviting public comment on our tentative decision. Public notice will be in a newspaper of general circulation in the area of the facility. Please submit copies of your response to:

RCRA ACTIVITIES
Part B Permit Application
U.S. EPA, Region V
P.O. Box A3587
Chicago, Illinois 60690

Lawrence Eastep, Manager
Permit Section, DLPC
Illinois EPA
2200 Churchill Road
Springfield, Illinois 62706

Please call the previously identified contact for this permit application if you have any questions, or wish to discuss this matter further.

Sincerely yours,

Edith M. Ardiente, P.E.
Chief, Technical Programs Section

Enclosures

5HS-12:H.Witschonke:fr:7/22/85

NK 7/25/85

	[illegible]							[illegible] CHIEF	[illegible]
INITIAL DATE	EA 7/24/85	CW 7/25/85		7/25/85			CK 7/25/85		

P 246 373 001

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

Sent to: Richard L. Purgason, Plant Mgr Allied Chemical Company	
Street and No.: Post Office Box 13	
P.O., State and ZIP Code: Danville, Illinois 61832	
Postage	$ .39
Certified Fee	.75
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to whom and Date Delivered	.70
Return receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	$ 1.84
Postmark or Date	

CHICAGO ILL. JUL 29 1985 USPO

PS Form 3800, Feb. 1982

★ U.S.G.P.O. 1984-446-014

H.Witschonke. 5HS-12. STU#1. ILD 005463344

SENDER: Complete items 1, 2, 3 and 4.

Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for service(s) requested.

1. ☒ Show to whom, date and address of delivery.
2. ☐ Restricted Delivery.

3. Article Addressed to:
Richard L. Purgason, Plant Mgr.
Allied Chemical Company
Post Office Box 13
Danville, Illinois 61832

4. Type of Service:
☐ Registered ☐ Insured
☐ Certified ☐ COD
☒ Express Mail

Article Number
P246373001

Always obtain signature of addressee or agent and DATE DELIVERED.

5. Signature – Addressee
X

6. Signature – Agent
X

7. Date of Delivery
JUL 30 1985

8. Addressee's Address *(ONLY if requested and fee paid)*

PS Form 3811, July 1983 447-845

DOMESTIC RETURN RECEIPT

H.Witschonke. 5HS-12. STU#1. ILD 005463344

file

Illinois Environmental Protection Agency · 2200 Churchill Road, Springfield, IL 62706

217/782-6761

Refer to: 1838040027 -- Vermilion County FA015
Danville/Allied Chemical
ILD005463344

June 3, 1985

Allied Corporation
Attention: Robert J. Ford
Health, Safety and Environmental Services
Post Office Box 2332R
Morristown, N.J. 07960

Dear Mr. Ford:

The Agency is in receipt of your May 2, 1985 response to our CIL dated April 17, 1985. Your response has been reviewed and resolves the apparent violation(s) of Section(s) 725, Subparts G and H.

Also, as a reminder, your updated instrument(s) for the year ending December 31, 1985, will be due by March 31, 1986.

If you have any questions or if we can be of assistance, please do not hesitate to contact Andrew A. Vollmer or the writer at the above number.

Very truly yours,

Rama K. Chaturvedi

Rama K. Chaturvedi, P.E., Manager
Permit Program Development Unit
Permit Section
Division of Land Pollution Control

RKC:ED:ct/1213E,2

cc: Division File
Compliance
Champaign Region
Cindy Davis, Coordinator

217/782-6761

Certified #

Refer to: 1538040027 -- Vermillion County FA015
Danville/Allied Chemical
ILD006463344

COMPLIANCE INQUIRY LETTER

April 17, 1985

Mr. Robert J. Ford
Allied Corporation
Health, Safety and Environmental Services
P.O. Box 2332R
Morristown, New Jersey 07960

Dear Mr. Ford:

The purpose of this letter is to address the status of the above-referenced facility in relation to the requirements of Title 35, Subpart G and H and to inquire as to your position with respect to the apparent violations identified in Attachment A and your plans to correct these apparent violations.

The Agency's findings of apparent non-compliance in Attachment A are based on a April 5, 1985 review of documents submitted to the Agency to demonstrate compliance with the requirements of Subpart G and H.

Please submit in writing, within fifteen (15) calendar days of the date of this letter, the reasons for the identified violations and a description of the steps which have been taken to correct the identified violations. The written response should be sent to the following:

Mark A. Maney, Manager
Facilities Compliance Unit
Compliance Monitoring Section
Illinois Environmental Protection Agency
Division of Land Pollution Control
2200 Churchill Road
Springfield, Illinois 62706

Further, take notice that non-compliance with the requirements of the Illinois Environmental Protection Act and rules and regulations adopted thereunder may be the subject of enforcement action pursuant to either the Illinois Environmental Protection Act, Ill. Rev. Stat., Ch. 111 1/2, Sec. 1001 et seq. or the federal Resource Conservation and Recovery Act (RCRA), 42 U.S.C. Sec. 6901 et seq.

If you have any questions regarding the above, please contact Andy Vollmer at 217/782-3884.

Sincerely,

Mark A. Nanny, Manager
Facilities Compliance Unit
Compliance Monitoring Section
Division of Land Pollution Control

MAN:BF/rmt/0746E/46-47

cc: Division File
Central Region - Champaign
Gary King
Virginia Yang
Andy Vollmer
Bur Filson

Attachment A

1. The closure plan fails to provide the step of decontamination as required by 725.214 (40 CFR 265.114). When closure is completed, all the facility equipment and structures must have been properly disposed of, or decontaminated by removing all hazardous wastes and residues.

2. The closure cost estimate fails to provide the cost of decontamination as required by 725.242 (40 CFR 265.142). The owner or operator must prepare a written estimate, in current dollars, of the cost of closing the facility in accordance with the closure plan.

DF/rml/0746E/49

LPC #18380427 - Vermilion Co.
Danville / Allied Chemical Corporation
STATE IDENTIFICATION NUMBER
(If Applicable)

ILD #005463344
EPA IDENTIFICATION NUMB

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form A - General Facility Standards

I. General Information:

(A) Facility Name: Allied Chemical Corporation

(B) Street: P.O. Box 13, Brewer Rd.

(C) City: Danville (D) State: Illinois (E) Zip Code: 61832

(F) Phone: 217/446-4700 (G) County: Vermilion

(H) Operator: Allied Chemical Corporation

(I) Street: P.O. Box 13, Brewer Rd.

(J) City: Danville (K) State: Illinois (L) Zip Code 61832

(M) Phone: 217/446-4700 (N) County: Vermilion

(O) Owner: Allied Corporation

(P) Street: Columbia Road and Park Avenue

(Q) City: Morristown (R) State: New Jersey (S) Zip Code: 07960

(T) Phone: 201/445-2000 (U) County: -

(V) Date of Inspection: 06/21/84 (W) Time of Inspection (From) 2:00 pm (To) 4:20 pm

(X) Weather Conditions: 80°, Cloudy, Rain

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Rev. 3-6-81/J.B.

IL 532-0894
LPC 92 12/81

(Y) Person(s) Interviewed	Title	Telephone
George Kady	Supervisor, Safety and Pollution Control	217/446-4700

(Z) Inspection Participants	Agency/Title	Telephone
David C. Jansen	IEPA/EPS III	217/786-6892
David C Jansen		

(AA) Preparer Information

Name	Agency/Title	Telephone
David C. Jansen	IEPA/EPS III	217/786-6892

II. SITE ACTIVITY:

Complete sections I through VII for all treatment, storage, and/or disposal facilities. Complete the forms (in parenthesis) in section VIII corresponding to the site activities identified below:

X A. Storage and/or Treatment
- 1. Containers (I)
- 2. Tanks (J)
- 3. Surface Impoundments (K)
- 4. Waste Piles (L)

___ B. Land Treatment (M)

___ C. Landfills (N)

___ D. Incineration and/or Thermal Treatment (O and P)

___ E. Chemical, Physical, and Biological Treatment (Q)

Note: If facility is also a generator or transporter of hazardous waste complete sections IX and X of this form as appropriate.

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III. GENERAL FACILITY STANDARDS:
(Part 265 Subpart B)

35 Illinois Administrative Code (35 IL. A. C.) Part 725 Subpart B)

	Yes	No	NI*	Remark
(A) Has the Regional Administrator been notified regarding:				
1. Receipt of hazardous waste from a foreign source?	___	___	___	Does Not Apply (DNA)
2. Facility expansion?	___	___	___	DNA
(B) General Waste Analysis:				
1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	X	___	___	
2. Does the owner or operator have a detailed waste analysis plan on file at the facility?	X	___	___	
3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	___	___	___	DNA
(C) Security - Do security measures include: (if applicable)				
1. 24-Hour surveillance?	X	___	___	-Cameras -Security Guards no longer employed
2. Artificial or natural barrier around facility?	X	___	___	
3. Controlled entry?	X	___	___	
4. Danger sign(s) at entrance?	X	___	___	
(D) Do Owner or Operator Inspections Include:				
1. Records of malfunctions?	___	___	___	No malfunctions
2. Records of operator error?	___	___	___	No errors
3. Records of discharges?	___	___	___	No Discharges

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	Yes	No	NI*	Remarks
4. Inspection schedule?	X	---	---	----------
5. Safety, emergency equipment?	X	---	---	----------
6. Security devices?	X	---	---	----------
7. Operating and structural devices?	X	---	---	----------
8. Inspection log?	X	---	---	----------
(E) Do personnel training records include: (Effective 5/19/81)				
1. Job titles?	X	---	---	----------
2. Job descriptions?	X	---	---	----------
3. Description of training?	X	---	---	----------
4. Records of training?	X	---	---	----------
5. Have facility personnel received required training by 5-19-81?	X	---	---	----------
6. Do new personnel receive required training within six months?	X	---	---	----------
(F) If required are the following special requirements for ignitable, reactive, or incompatible wastes addressed?				
1. Special handling?	X	---	---	----------
2. No smoking signs?	X	---	---	----------
3. Separation and protection from ignition sources?	X	---	---	----------

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IV. PREPAREDNESS AND PREVENTION:
(Part 265 Subpart C)

35 IL. A. C. Part 725 Subpart C

	Yes	No	NI*	Remarks
(A) Maintenance and Operation of Facility:				
Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?	___	X	___	None solely from current operation
(B) If required, does the facility have the following equipment:				
1. Internal communications or alarm systems?	X	___	___	
2. Telephone or 2-way radios at the scene of operations?	X	___	___	
3. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?	X	___	___	

Indicate the volume of water and/or foam available for fire control:

200,000 gallons and city water

numerous extinguishers

(C) Testing and Maintenance of Emergency Equipment:				
1. Has the owner or operator established testing and maintenance procedures for emergency equipment?	X	___	___	
2. Is emergency equipment maintained in operable conditions?	X	___	___	
(D) Has owner or operator provided immediate access to internal alarms? (if needed)	X	___	___	

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		Yes	No	NI*	Remarks
(E)	Is there adequate aisle space for unobstructed movement?	X			

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES:
(Part 265 Subpart D)

35 IL. A. C. Part 725 Subpart D

(A) Does the Contingency Plan contain the following information:	Yes	No	NI*	Remarks
1. The actions facility personnel must take to comply with (§725.151 & 725.156) §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)	X			
2. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37? (§725.137)	X			
3. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?	X			
4. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?	X			
5. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)				Plan Not Necessary

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	Yes	No	NI*	Remarks
(B) Are copies of the Contingency Plan available at site and local emergency organizations?	X			
(C) Emergency Coordinator				
1. Is the facility Emergency Coordinator identified?	X			
2. Is coordinator familiar with all aspects of site operation and emergency procedures?	X			
3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	X			
(D) Emergency Procedures				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56? (725.156)				No emergencies to-date

VI. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING
(Part 265 Subpart E)
35 IL. A. C. Part 725 Subpart E

	Yes	No	NI*	Remarks
(A) Use of Manifest System				
1. Does the facility follow the procedures listed in §265.71 for processing each manifest? (725.171)				DNA
2. Are records of past shipments retained for 3 years?				DNA
(B) Does the owner or operator meet requirements regarding manifest discrepancies?				DNA

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Operating Record

1.	Does the owner or operator maintain an operating record as required in 265.73? (725.173)	X			
2.	Does the operating record contain the following information:				
**b.	The method(s) and date(s) of each waste's treatment, storage, or disposal as required in Appendix I?	X			Recorded in inspection logs
c.	The location and quantity of each hazardous waste within the facility?	X			Recorded in inspection logs
***d.	A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)				DNA
e.	Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?	X			
f.	Reports detailing all incidents that required implementation of the Contingency Plan?				No Incidents
g.	All closure and post closure costs as applicable? (Effective 5-19-81)	X			

** See page 33252 of the May 19, 1980, Federal Register.

*** Only applies to disposal facilities

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VII. CLOSURE AND POST CLOSURE
(Part 265 Subpart G)
35 IL. A. C. Part 725 Subpart G

	Yes	No	NI*	Remarks
(A) Closure and Post Closure				
1. Is the facility closure plan available for inspection by May 19, 1981?	X			
2. Has this plan been submitted to the Regional Administrator		X		
3. Has closure begun?		X		
4. Is closure estimate available by May 19, 1981?	X			
(B) Post closure care and use of property				
Has the owner or operator supplied a post closure monitoring plan? (effective by May 19, 1981)				DNA

VIII. FACILITY STANDARDS
(Part 265, Subparts I thru R)
35 IL. A. C. Part 725, Subparts I thru R

I
USE AND MANAGEMENT OF CONTAINERS

Facility Name: Allied Chemical Date of Inspection: 6/21/84

	Yes	No	NI*	Remarks
1. Are containers in good condition?	X			
2. Are containers compatible with waste in them?	X			
3. Are containers stored closed?	X			
4. Are containers managed to prevent leaks?	X			
5. Are containers inspected weekly for leaks and defects?	X			
6. Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive.)				DNA

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	Yes	No	NI*	Remarks
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.) (35 IL. A. C. 725.117 (b))	---	---	---	DNA
8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?	---	---	---	DNA

J
TANKS

Facility Name: Allied Chemical Date of Inspection: 6/21/84

1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank?	X	---	---	Rubber lined steel tanks
2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?	X	---	---	Effluent Collection sump
3. Do continuous feed systems have a waste-feed cutoff?	X	---	---	---
4. Are waste analyses done before the tanks are used to store a substantially different waste than before?	---	---	---	DNA
5. Are required daily and weekly inspections done?	X	---	---	---
6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	---	---	---	DNA
7. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.) (35 IL. A. C. 725.117 (b))	---	---	---	DNA

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	Yes	No	NI*	Remarks

8. Has the owner or operator observed the National Fire Protection Association's buffer zone requirements for tanks containing ignitable or reactive wastes?

   Tank capacity: DNA gallons

   Tank diameter: _____ feet

   Distance of tank from property line _____ feet

   (See table 2 - 1 through 2 - 6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

K
SURFACE IMPOUNDMENTS

Facility Name: _____ Date of Inspection: _____

1. Do surface impoundments have at least 60 cm (2 feet) of freeboard?				
2. Do earthen dikes have protective covers?				
3. Are waste analyses done when the impoundment is used to store a substantially different waste than before?				
4. Is the freeboard level inspected at least daily?				
5. Are the dikes inspected weekly for evidence of leaks or deterioration?				
6. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)				
7. Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.) (35 IL. A. C. 725.117 (b))				

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L

WASTE PILES

Facility Name: _____ Date of Inspection: _____

	Yes	No	NI*	Remarks
1. Are waste piles covered or protected from dispersal by wind?	---	---	---	---
2. Is each in-coming movement of waste analyzed before being added to the waste pile?	---	---	---	---
3. Are leachate, run-off, and run-on controlled as per the requirements of 265.258? (The effective date of this provision is Nov. 19, 1981.)	---	---	---	---
4. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a pile? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	---	---	---	---
5. Are piles of reactive or ignitable waste protected from materials or conditions that might cause them to ignite or react?	---	---	---	---
6. Are incompatible wastes stored in different piles? (If not, the provisions of 40 CFR 265.17(b) apply.) (35 IL. A. C. 725.117 (b))	---	---	---	---
7. Are piles of imcompatible waste protected by barriers or distance from other waste?	---	---	---	---

*Not Inspected

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M

LAND TREATMENT

Facility Name: _____ Date of Inspection: _____

1.	Is treated hazardous waste capable of biological or chemical degradation?	---	---	---
2.	Are run-off and run-on diverted from the facility or collected? (Effective date: November 19, 1981)?	---	---	---
3.	Is waste analyzed according to 265.273? (725.373)	---	---	---
4.	If food chain crops are grown at the facility, has the owner or operator addressed the requirements of 265.276? (725.376)	---	---	---
5.	Is an unsaturated zone monitoring plan designed and implemented to detect the vertical migration of hazardous waste and provide information on the background concentrations of the hazardous waste available?	---	---	---
6.	Does the unsaturated zone monitoring plan address the minimum information specified in 265.278? (725.378)	---	---	---
7.	Are records kept regarding application dates and rates, quantities, and locations, of all hazardous waste placed in the facility?	---	---	---
8.	Are the special requirements fulfilled regarding land treatment of ignitable or reactive wastes? (Indicate if waste is ignitable or reactive.)	---	---	---
9.	Are incompatible wastes land treated? (If yes, 265.17(b) applies) (725.117 (b))	---	---	---

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N
LANDFILLS

Facility Name: _____ Date of Inspection: _____

	Yes	No	NI*	Remarks
(A) General Operating Requirements Does the facility provide the following:				
**1. Diversion of run-on away from active portions of the fill?	---	---	---	_____
**2. Collection of run-off from active portions of the fill?	---	---	---	_____
**3. Is collected run off treated?	---	---	---	_____
4. Control of wind dispersal of hazardous waste?	---	---	---	_____
(**Effective 11-19-81)				
(B) Surveying and Recordkeeping Does the Operating Record Include:				
1. A map showing the exact location and dimensions of each cell?	---	---	---	_____
2. The contents of each cell and the location of each hazardous waste type withing each cell?	---	---	---	_____
(C) Closure and Post-Closure				
1. Is the Closure Plan available for inspection by 5-19-81?	---	---	---	_____
2. Has this plan been submitted to the Regional Administrator?	---	---	---	_____
3. Has closure begun?	---	---	---	_____
4. Is closure cost estimate available by 5-19-81?	---	---	---	_____
(D) Special requirements for ignitable or reactive waste				
Are ignitable or reactive waste treated so the resulting mixture is no longer ignitable or reactive?	___	___	___	_____

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	Yes	No	NI*	Remarks
(If waste is rendered non-reactive or non-ignitable see treatment requirements) If not, the provisions of 40 CFR 265.17(b) apply. (35 IL. A. C. 725.117 (b))	—	—	—	
(E) Special Requirements for Incompatible Wastes. Does the owner or operator dispose of incompatible wastes in separate cells?	—	—	—	
If not, the provisions of 40 CFR 265.17(b) apply. (35 IL. A. C. 725.117 (b))	—	—	—	
(F) Special requirements for liquid waste (effective 11-19-81) 1. Are bulk or non-containerized liquids placed in the landfill?	—	—	—	
2. Does the landfill have a chemically and physically resistant liner system?	—	—	—	
3. Does the landfill have a functional leachate collection system?	—	—	—	
4. Are free liquids stabilized prior to or immediately after placement in the landfill?	—	—	—	
(G) Special requirements for Containers (effective 11-19-81) Are empty containers crushed flat, shredded, or similarly reduced in volume before being buried beneath the surface of the landfill?	—	—	—	

*Not Inspected

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O and P
INCINERATION and THERMAL TREATMENT

(A) Facility Name: _____

(B) Date of Inspection: _____

I. Determination of Steady State

A. Type of unit (i.e., type of incinerator or thermal treatment): _____

_____

B. Components and steady state condition:

Component	**** Was this component at SS prior to adding waste? Yes	No	NI*	Remarks
1. _____	___	___	___	_____
2. _____	___	___	___	_____
3. _____	___	___	___	_____
4. _____	___	___	___	_____
5. _____	___	___	___	_____

II. Waste Analysis

A. Minimum requirements, for wastes not previously burned/treated.

1. Required analyses; has an analysis been performed for the following?	Yes	No	NI*	Remarks
a. Heating value	___	___	___	_____
b. Halogen content	___	___	___	_____
c. Sulfur content	___	___	___	_____

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	Yes	No	NI*	Remarks
2. Has documented or written data been substituted for analysis of either:				
a. Lead?	___	___	___	_____
b. Mercury?	___	___	___	_____

B. List other parameters for which the waste is tested to enable owner or operator to establi steady state or determine the types of pollutants which may be emitted. (Note in Remarks any which you feel should be tested.)

		Remarks
1.	_____	_____
2.	_____	_____
3.	_____	_____
4.	_____	_____
5.	_____	_____

III. Monitoring and Inspections

	Yes	No	NI*	Remarks
A. Are combustion/emission control instruments monitored at least every 15 minutes?	___	___	___	_____
B. Is steady state maintained or corrections attempted?	___	___	___	_____
C. Is stack plume observed at least hourly for normal color and opacity?	___	___	___	_____
D. Did any stack observations made by owner or operator show a plume different than normal?**	___	___	___	_____
E. If yes to D above, were corrections made to return emissions to normal appearance?**	___	___	___	_____
F. Are the complete unit and associated equipment inspected daily for leaks, spills, and fugitive emissions?	___	___	___	_____
G. Are emergency shutdown controls and system alarms checked daily for proper operation?	___	___	___	_____

*Not Inspected

**Specify in Remarks for what period of time this was checked.

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IV. Open Burning

A. Only complete this part if the facility open burns hazardous waste.

	Yes	No	NI*	Remarks
1. Does this facility burn only waste explosives? (A No answer means other hazardous waste is open-burned.)	—	—	—	
2. If this facility open-burns waste explosives, does it burn the waste at a distance greater than or equal to the minimum specified distance (below)	—	—	—	

Pounds of waste explosives or propellants	Minimum distance from open burning or detonation to the property of others	
0 to 100.....	204 m	670 ft
101 to 1,000.....	380 m	1,250 ft
1,001 to 10,000.....	530 m	1,730 ft
10,0001 to 30,000.....	690 m	2,260 ft

Q

CHEMICAL, PHYSICAL and BIOLOGICAL TREATMENT

Facility Name: _____

Date of Inspection: _____

	Yes	No	NI*	Remarks
1. Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature failure?	—	—	—	
2. Is a continuously fed system equipped with a means of hazardous waste inflow stoppage or control (e.g., cut-off system?)	—	—	—	

*Not Inspected

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	Yes	No	NI*	Remarks
3. Has the owner or operator addressed the waste analysis requirements of 265.402? (725.502)	___	___	___	_____
4. Are inspection procedures followed according to 265.403? (725.503)	___	___	___	_____
5. Are the special requirements fulfilled for ignitable or reactive wastes?	___	___	___	_____
6. Are incompatible wastes treated? (If yes, 265.17(b) applies.) (725.117 (b))	___	___	___	_____

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) - wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutralize wastes which are hazardous only because they exhibit the corrosivity characteristic under 40 CFR §261.2 or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason

IX

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

1. MANIFEST REQUIREMENTS

	Yes	No	NI*	Remarks
(A) Does the operator have copies of the manifest available for review?	X	___	___	_____
(B) Do the manifest forms reviewed contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements)				
1. Manifest document number?	X	___	___	_____
2. Name, mailing address, telephone number, and EPA ID Number of Generator	X	___	___	RECEIVED AUG 02 1984 IEPA-DLPC

		Yes	No	NI*	Remarks
3.	Name and EPA ID Number of Transporter(s)?	X			
4.	Name, address, and EPA ID Number of Designated permitted facility and alternate facility?	X			
5.	The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	X			
6.	The total quantity of waste(s) and the type and number of containers loaded?	X			
7.	Required certification?	X			
8.	Required signatures?	X			
(C)	Does the owner or operator submit exception reports when needed?				None needed to date

2. PRE-TRANSPORT REQUIREMENTS

(A)	Is waste packaged in accordance with DOT Regulations? (Required prior to movement of hazardous waste off-site)	X			
(B)	Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required to movement of hazardous waste off-site)	X			
(C)	If required, are placards available to transporters of hazardous waste?	X			

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Omit Section 3 if the facility has interim status and its Part A permit application describes storage

3. On Site Accumulation

		Yes	No	NI*	Remarks
1.	Are containers marked with start of accumulation date?				
2.	Are the containers of hazardous waste removed from installation before they can accumulate for more than 90 days?				
3.	Are wastes stored in containers managed in accordance with 40 CFR Part 265.174 and 265.176 (weekly inspections of containers, containers holding ignitable or reactive wastes located at least 15 meters (50 Feet) from facility's property line? (35 IL. A. C. 725.274 and 725.276)				
4.	If wastes are stored in tanks, are the tanks managed according to the following requirements?				
	a. Are tanks used to store only those wastes which will not cause corrosion leakage or premature failure of the tank?				
	b. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, dikes, or other containment structures?				
	c. Do continuous feed systems have a waste-feed cutoff?				
	d. Are required daily and weekly inspections done?				
	e. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements?				
	f. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply) (35 IL. A. C. 725.117 (b))				

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*Not Inspected

VI. RECORDKEEPING and REPORTING
(Part 262, Subpart D)
35 IL. A. C. Part 722, Subpart D

	Yes	No	NI*	Remarks
(A) Are Manifests, Annual Reports, Exception Reports, and all test results and analyses retained for at least three years?	X			
(B) Has the generator submitted Annual Reports and Exception Reports as required?	X			

VII. INTERNATIONAL SHIPMENTS
(Part 262, Subpart E)
35 IL. A. C. Part 722, Subpart E

	Yes	No	NI*	Remarks
Has the installation imported or exported Hazardous Waste?		X		

(If answered Yes, complete the following as applicable.)

	Yes	No	NI*	Remarks
1. Exporting Hazardous waste, has a generator:				
a. Notified the Administrator in writing?				
b. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?				
c. Met the Manifest requirements?				
2. Importing Hazardous Waste, has the generator:				
Met the manifest requirements?				

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X

TRANSPORTER REQUIREMENTS
40 CFR Part 263
35 IL. A. C. Part 723

● Complete this Section if the owner or operator transports hazardous waste.

I. MANIFEST SYSTEM AND RECORDKEEPING
(Subpart B)

	Yes	No	NI*	Remarks
Are copies of the completed manifests or shipping paper(s) available for review and retained for three years?	—	—	—	

II. INTERNATIOINAL SHIPMENTS

	Yes	No	NI*	Remarks
A. Does the transporter record on the manifest the date the waste left the U.S.?	—	—	—	
B. Are signed completed manifest(s) on file?	—	—	—	

V. MISCELLANEOUS

	Yes	No	NI*	Remarks
A. Does transporter transport hazardous waste into the U.S. from abroad?	—	—	—	
B. Does the transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container?	—	—	—	

NOTE: If (A) or (B) were answered "Yes" then the Transporter is also a Generator and must comply with the Generator regulations.

●

*Not Inspected

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REMARKS

Use this section to briefly describe site activities observed at the time of the inspection. Note any possible violations of Interim Status Standards.

Allied manufactures and packages refrigerants and aerosol propellants. Waste hydrochloric acid is generated as a by-product. Acid wastes are deep well injected. Other wastes are stored in containers.

Apparent violations are noted in the attached letter.

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Allied Chemical

P.O. Box 13
Danville, Illinois 61832
(217) 446-4700

1833042 7 - Vermilion Co.
Danville / Allied Chemical

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NOV 10 1983
ENVIRONMENTAL PROTECTION AGENCY
STATE OF ILLINOIS

November 7, 1983

Mr. Glenn D. Savage, Jr.
Central Region Manager
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
Land Field Operations Section
Division of Land Pollution Control
4500 S. Sixth Street
Springfield, Illinois 62706

RE: 9/20/83 RCRA INSPECTION REPORT

Dear Mr. Savage:

In response to your letter of October 20th, the following actions have been taken to insure Danville Works' compliance with the Illinois Environmental Protection Act.

Item 1 - Analyses of Waste M-17 Solvent

This waste has not previously been, nor will it normally be, generated at this facility. We have recently obtained information from our supplier on the composition and characteristics of the solvent. With this information we are currently making arrangements to have this one drum incinerated at an appropriate facility.

Item 2 - Written Inspection Schedule

It has been our practice to routinely inspect all monitoring equipment, safety and emergency equipment, security devices and operating and structural equipment that are important to preventing, detecting or responding to environmental or human health hazards. To demonstrate compliance with 35 IL A. C. 725.115 (b) we have included a written schedule for same in our RCRA file.

Item 3 - Operating Record

Our weekly inspection forms have been revised to record the location and quantity of each hazardous waste stored in the containerized storage area.

Item 4 - Used Paint Filters

These filters are currently being analyzed to determine whether they exhibit any hazardous waste characteristics. They will be stored on-site until disposal can be made on the basis of the completed waste characterization.

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STATE OF ILLINOIS

Per your suggestion, our Part A application is under review and will be updated shortly. Please let us know if you need any additional information.

Very truly yours,

R. L. Purgason
Plant Manager

RLP:cmm

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E.P.A. — D.L.P.C.
STATE OF ILLINOIS

ILLINOIS
Environmental Protection Agency
4500 S. Sixth Street Springfield, IL. 62706
Ph. (217) 786-6892

CERTIFIED MAIL
#157231

October 20, 1983

Refer to: LPC #18380427 - Vermilion County
Danville/Allied Chemical
ILD #005463344
COMPLIANCE INQUIRY LETTER

Allied Chemical
P. O. Box 13
Brewer Road
Danville, Illinois 61832

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OCT 27 1983
STATE OF ILLINOIS

ATTENTION: Mr. R. L. Purgason
Plant Manager

Dear Mr. Purgason:

An inspection of your facility was conducted by a representative of the Illinois Environmental Protection Agency (IEPA) on September 20, 1983. The purpose of the inspection was to determine your facility's compliance with the Illinois Environmental Protection Act, Ill. Rev. Stat. 1982, Ch. 111½, §§1001 et seq., as amended, and regulations adopted by the Illinois Pollution Control Board. During the inspection, the following apparent violations were observed:

> ... Pursuant to the 35 Illinois Administrative Code (35 IL. A. C.) 725.113, the owner/operator is required to conduct a detailed chemical and physical analysis of a representative sample of hazardous waste prior to storage. At the time of the inspection, these analyses for a barrel of waste labeled M-17 solvent were not available. Records and results of waste analyses must be maintained in the operating record, pursuant to the 35 IL. A. C. 725.173.
>
> ... Pursuant to the 35 IL. A. C. 725.115(b), the owner/operator must develop and follow a written schedule for inspection of all equipment and devices that are important to preventing, detect-

ing or responding to environmental or human health hazards. At the time of the inspection, a written schedule was not provided.

... Pursuant to the 35 IL. A. C. 725.173(b), the owner/operator must maintain a record of each hazardous waste received (if applicable), treated, stored, or disposed at the facility as required by Appendix I (see page 33252 of May 19, 1980 CFR), and record the location of each hazardous waste within the facility, and the quantity at each location. You are in apparent violation of the 35 IL. A. C. 725.173(b) in that such records are not maintained for the containerized storage area.

... Pursuant to the 35 IL. A. C. 722.111, a person who generates a solid waste must determine if that waste is a hazardous waste. You are in apparent violation of the 35 IL. A. C. 722.111 in that such determination has not been made for waste paint filters and overspray generated in your spray paint booths. Currently used paint filters are discarded at the local landfill.

You should also be aware that a revised Part A permit application must be submitted to the U.S.E.P.A., Region V prior to changing processes for the treatment, storage, or disposal of hazardous wastes, and prior to treating, storing, or disposing of any new hazardous wastes not previously identified on your Part A. A revised Part A was not submitted to include the containerized storage of paint sludge (D007 and D001), and contaminated carbon tetrachloride (U211 and D004). These wastes were stored for more than 90 days prior to their shipment off-site on June 15, 1982, under I.E.P.A. Permits #920367 and #920366, respectively.

A revised Part A application may have to be submitted for the containerized storage of M-17 solvent. A hazardous waste label on a barrel of waste M-17 solvent indicated an accumulation date of June 1, 1981.

You are hereby requested to submit to this Agency, within fifteen (15) days of receipt of this letter, a description of steps taken to correct the apparent violations described in this

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STATE OF ILLINOIS

letter. Failure to correct these apparent violations may result in enforcement actions. Please send your reply to the above address. Should you have any questions concerning this matter, please contact David C. Jansen of my staff at the above number.

Sincerely,

Glenn D. Savage Jr.

Glenn D. Savage, Jr.
Central Region Manager
Land Field Operations Section
Division of Land Pollution Control

GDS/DCJ/cp

Enclosure

cc: DLPC/Division File
DLPC/FOS, Central Region
R. Stone/USEPA, Region V
G. Kady/Allied Chemical
N. Lanter/Allied Chemical

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OCT 27 1983
[illegible]
STATE OF ILLINOIS

LPC #18380427-Vermilion Co.
Danville/Allied Chemical
STATE IDENTIFICATION NUMBER
(If Applicable)

ILD #005463344
EPA IDENTIFICATION NUMB

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form A - General Facility Standards

I. General Information:

(A) Facility Name: Allied Chemical Corporation

(B) Street: P. O. Box 13, Brewer Road

(C) City: Danville (D) State: IL. (E) Zip Code: 61832

(F) Phone: 217/446-4700 (G) County: Vermilion

(H) Operator: Allied Chemical Corporation

(I) Street: P. O. Box 13, Brewer Road

(J) City: Danville (K) State: IL. (L) Zip Code 61832

(M) Phone: 217/446-4700 (N) County: Vermilion

(O) Owner: Allied Corporation

(P) Street: Columbia Road & Park Avenue

(Q) City: Morristown (R) State: New Jersey (S) Zip Code: 07960

(T) Phone: 201/455-2000 (U) County: --

(V) Date of Inspection: 9/20/83 (W) Time of Inspection (From) 9:30 A. (To) 2:30 P.

(X) Weather Conditions: 70°, Cloudy, Wet

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[illegible]
STATE OF ILLINOIS

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Rev. 3-6-81/J.B.

IL 532-0894
LPC 92 12/81

(Y) Person(s) Interviewed	Title	Telephone
Norm Lanter	Supv., Env. Serv.	217/446-4700
George Kady	*Supv., Env. Serv.	217/446-4700
*Mr. Kady is replacing Mr. Lanter		

(Z) Inspection Participants	Agency/Title	Telephone
David C. Jansen	IEPA/EPS III	217/786-6892
David C Jansen		

(AA) Preparer Information

Name	Agency/Title	Telephone
David C. Jansen	IEPA/EPS III	217/786-6892

II. SITE ACTIVITY:

Complete sections I through VII for all treatment, storage, and/or disposal facilities. Complete the forms (in parenthesis) in section VIII corresponding to the site activities identified below:

X A. Storage and/or Treatment
   1. Containers (I)
   2. Tanks (J)
   3. Surface Impoundments (K)
   4. Waste Piles (L)

___B. Land Treatment (M)

___C. Landfills (N)

___D. Incineration and/or Thermal Treatment (O and P)

___E. Chemical, Physical, and Biological Treatment (Q)

Note: If facility is also a generator or transporter of hazardous waste complete sections IX and X of this form as appropriate.

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REMARKS

Use this section to briefly describe site activities observed at the time of the inspection. Note any possible violations of Interim Status Standards.

Allied produces hydrochloric acid, and flurocarbon refrigerants marketed under the trade name Genetron. Allied also blends and packages refrigerants and aerosol propellants.

Apparent violations observed during the inspection are noted in this report and/or the attached letter.

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OCT 27 1983
EPA - DLC
STATE OF ILLINOIS

AUG 15 1983

5HW

Gregory Zak, Manager
Compliance Assurance, DLPC
Illinois Environmental Protection
Agency
2200 Churchill Road
Springfield, Illinois 62706

Re: Allied Corp. ILD 005463344
Cabot Corp. ILD 042075333

Dear Mr. Zak:

Please send us the following information for the above referenced facilities within two weeks:

1) copies of the latest annual reports;

2) compliance status;

3) dates of last inspections; and

4) number of ground-water monitoring wells for any surface impoundments.

Thank you for your help in expediting this matter. Contact Mr. Greg Weber of my staff, at (312) 886-3719, if you have questions.

Sincerely,

William H. Miner, Chief
Technical, Permits, and Compliance Section

bcc: Joe Boyle

5HW/Weber/mg 8/11/83

	TYPIST	AUTHOR	STU #1 CHIEF	STU #2 CHIEF	STU #3 CHIEF	TPS CHIEF	WMB CHIEF	WMD DIRECTOR
INITIALS	mg							
DATE	8/11/83	8/11/83	8/11/83			8/12/83 8/12/83 8/12/83		

656

ILLINOIS EPA
Environmental Protection Agency
4500 S. Sixth Street Springfield, IL. 62706
Ph. (217) 786-6892

March 26, 1982

Refer to: LPC #18380427 - Vermilion County
Danville/Allied (Chemical) Corporation
ILD #005463344

Allied (Chemical) Corporation
P. O. Box 13
Brewer Road
Danville, Illinois 61832

ATTENTION: Mr. Norman Lanter

Dear Mr. Lanter:

An inspection of the above facility was conducted by a representative of the Illinois Environmental Protection Agency (IEPA) on March 16, 1982. The inspection was conducted under the authorization of the United States Environmental Protection Agency (USEPA). A copy of the inspection report is enclosed. The purpose of the inspection was to determine your facility's compliance status with the Resource Conservation and Recovery Act (RCRA) as amended. We are pleased to report that your facility was found to be in compliance.

Your cooperation and efforts in this matter are appreciated. Should you have any questions about the report, please contact Glenn Savage at the above number.

Sincerely,

Monte M. Nienkerk
Central Region Manager
Land Field Operations Section
Division of Land Pollution Control

MMN/GDS/cp

Enclosure

cc: DLPC Division File
DLPC/FOS, Central Region
U.S.E.P.A./Region V

LPC #18380427-Vermilion Co.-Danville/Allied Chemical
STATE IDENTIFICATION NUMBER (If Applicable)

ILD #005463344
EPA IDENTIFICATION NUMBER

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form A - General Facility Standards

I. General Information:

(A) Facility Name: Allied Chemical

(B) Street: P.O. Box 13 - Brewer Road

(C) City: Danville (D) State: IL. (E) Zip Code: 61832

(F) Phone: 217/446-4700 (G) County: Vermilion

(H) Operator: Allied Chemical

(I) Street: P.O. Box 13 - Brewer Road

(J) City: Danville (K) State: IL. (L) Zip Code 61832

(M) Phone: 217/446-4700 (N) County: Vermilion

(O) Owner: Allied Chemical

(P) Street: P.O. Box 13 - Brewer Road

(Q) City: Danville (R) State: IL. (S) Zip Code: 61832

(T) Phone: 217/446-4700 (U) County: Vermilion

(V) Date of Inspection: 3/16/82 (W) Time of Inspection (From) 10:10 A. (To) 12:10 P.

(X) Weather Conditions: Overcast, 60°, Windy

Rev. 3-6-81/J.B.

(Y) Person(s) Interviewed	Title	Telephone
Norman Lanter	Supv., Env. Services	217/446-4700

(Z) Inspection Participants	Agency/Title	Telephone
Glenn Savage	I.E.P.A./EPS	217/786-6892
Rick Hersemann	I.E.P.A./EPS	217/786-6892

(AA) Preparer Information

Name	Agency/Title	Telephone
Glenn Savage Glenn Savage	I.E.P.A./EPS	217/786-6892

II. SITE ACTIVITY:

Complete sections I through VII for all treatment, storage, and/or disposal facilities. Complete the forms (in parenthesis) in section VIII corresponding to the site activities identified below:

X A. Storage and/or Treatment
   1. Containers (I)
   2. Tanks (J)
   3. Surface Impoundments (K)
   4. Waste Piles (L)
   (See Below)

___B. Land Treatment (M)

___C. Landfills (N)

___D. Incineration and/or Thermal Treatment (O and P)

___E. Chemical, Physical, and Biological Treatment (Q)

(A) Drums, tanks and truck

Note: If facility is also a generator or transporter of hazardous waste complete sections IX and X of this form as appropriate.

III. GENERAL FACILITY STANDARDS:
(Part 265 Subpart B)

	Yes	No	NI*	Remark
(A) Has the Regional Administrator been notified regarding:				
1. Receipt of hazardous waste from a foreign source?	___	X	___	_____
2. Facility expansion?	___	X	___	_____
(B) General Waste Analysis:				
1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	X	___	___	_____
2. Does the owner or operator have a detailed waste analysis plan on file at the facility?	X	___	___	_____
3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	X	___	___	_____
(C) Security - Do security measures include: (if applicable)				
1. 24-Hour surveillance?	X	___	___	_____
2. Artificial or natural barrier around facility?	X	___	___	_____
3. Controlled entry?	X	___	___	_____
4. Danger sign(s) at entrance?	X	___	___	_____
(D) Do Owner or Operator Inspections Include:				
1. Records of malfunctions?	X	___	___	_____
2. Records of operator error?	X	___	___	_____
3. Records of discharges?	X	___	___	_____

*Not Inspected

	Yes	No	NI*	Remarks
4. Inspection schedule?	X			
5. Safety, emergency equipment?	X			
6. Security devices?	X			
7. Operating and structural devices?	X			
8. Inspection log?	X			
(E) Do personnel training records include: (Effective 5/19/81)				
1. Job titles?	X			
2. Job descriptions?	X			
3. Description of training?	X			
4. Records of training?	X			
5. Have facility personnel received required training by 5-19-81?	X			
6. Do new personnel receive required training within six months?	X			
(F) If required are the following special requirements for ignitable, reactive, or incompatible wastes addressed?				
1. Special handling?	X			
2. No smoking signs?	X			
3. Separation and protection from ignition sources?	X			

*Not Inspected

IV. PREPAREDNESS AND PREVENTION:
(Part 265 Subpart C)

		Yes	No	NI*	Remarks
(A)	Maintenance and Operation of Facility:				
	Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?		X		
(B)	If required, does the facility have the following equipment:				
	1. Internal communications or alarm systems?	X			
	2. Telephone or 2-way radios at the scene of operations?	X			7-two way radios, loud speaker system, general alarm
	3. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?	X			

Indicate the volume of water and/or foam available for fire control:

59 fire extinguishers; 2 fire pump motors; 6 fire blankets; 6 fire alarm boxes; and 4 sprinkler shut-offs.

(C)	Testing and Maintenance of Emergency Equipment:				
	1. Has the owner or operator established testing and maintenance procedures for emergency equipment?	X			6 months
	2. Is emergency equipment maintained in operable conditions?	X			
(D)	Has owner or operator provided immediate access to internal alarms? (if needed)	X			

*Not Inspected

		Yes	No	NI*	Remarks
(E)	Is there adequate aisle space for unobstructed movement?	X			

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES: (Part 265 Subpart D)

		Yes	No	NI*	Remarks
(A)	Does the Contingency Plan contain the following information:				
1.	The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)	X			
2.	Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?	X			
3.	Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?	X			
4.	A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?	X			
5.	An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)	X			

*Not Inspected

	Yes	No	NI*	Remarks
(B) Are copies of the Contingency Plan available at site and local emergency organizations?	X			
(C) Emergency Coordinator				
1. Is the facility Emergency Coordinator identified?	X			
2. Is coordinator familiar with all aspects of site operation and emergency procedures?	X			
3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	X			
(D) Emergency Procedures				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?				D.N.A.

VI. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING
(Part 265 Subpart E)

	Yes	No	NI*	Remarks
(A) Use of Manifest System				
1. Does the facility follow the procedures listed in §265.71 for processing each manifest?	X			
2. Are records of past shipments retained for 3 years?	X			
(B) Does the owner or operator meet requirements regarding manifest discrepancies?	X			

*Not Inspected

(C) Operating Record

1.	Does the owner or operator maintain an operating record as required in 265.73?	X			
2.	Does the operating record contain the following information:				
**b.	The method(s) and date(s) of each waste's treatment, storage, or disposal as required in Appendix I?	X			
c.	The location and quantity of each hazardous waste within the facility?	X			
***d.	A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)	X			
e.	Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?	X			
f.	Reports detailing all incidents that required implementation of the Contingency Plan?	X			
g.	All closure and post closure costs as applicable? (Effective 5-19-81)	X			

** See page 33252 of the May 19, 1980, Federal Register.

*** Only applies to disposal facilities

*Not Inspected

VII. CLOSURE AND POST CLOSURE
(Part 265 Subpart G)

	Yes	No	NI*	Remarks
(A) Closure and Post Closure				
1. Is the facility closure plan available for inspection by May 19, 1981?	X			
2. Has this plan been submitted to the Regional Administrator	X			Sent to Regional Office
3. Has closure begun?		X		
4. Is closure estimate available by May 19, 1981?	X			
(B) Post closure care and use of property				
Has the owner or operator supplied a post closure monitoring plan? (effective by May 19, 1981)			X	

VIII. FACILITY STANDARDS
(Part 265, Subparts I thru R)

I
USE AND MANAGEMENT OF CONTAINERS

Facility Name: Allied Chemical Date of Inspection: 3/16/82

	Yes	No	NI*	Remarks
1. Are containers in good condition?	X			
2. Are containers compatible with waste in them?	X			
3. Are containers stored closed?	X			
4. Are containers managed to prevent leaks?	X			
5. Are containers inspected weekly for leaks and defects?	X			
6. Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive.)	X			

	Yes	No	NI*	Remarks
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)	X			
8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?	X			

J
TANKS

Facility Name: Allied Chemical Date of Inspection: 3/16/82

1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank?	X			
2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?				D.N.A.
3. Do continuous feed systems have a waste-feed cutoff?	X			
4. Are waste analyses done before the tanks are used to store a substantially different waste than before?	X			
5. Are required daily and weekly inspections done?	X			
6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	X			
7. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.)	X			

*Not Inspected

		Yes	No	NI*	Remarks
3.	Name and EPA ID Number of Transporter(s)?	X			
4.	Name, address, and EPA ID Number of Designated permitted facility and alternate facility?	X			
5.	The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	X			
6.	The total quantity of waste(s) and the type and number of containers loaded?	X			
7.	Required certification?	X			
8.	Required signatures?	X			
(C)	Does the owner or operator submit exception reports when needed?				As yet, has not been needed

2. PRE-TRANSPORT REQUIREMENTS

(A)	Is waste packaged in accordance with DOT Regulations? (Required prior to movement of hazardous waste off-site)	X			
(B)	Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required to movement of hazardous waste off-site)	X			
(C)	If required, are placards available to transporters of hazardous waste?	X			

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

MEMORANDUM

TO: _____ DATE: _____

FROM: _____ ☐ Information only

SUBJECT: _____ ☐ Response requested

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

MEMORANDUM

TO: _____ DATE: _____

FROM: _____ ☐ Information only

SUBJECT: _____ ☐ Response requested

ENVIRONMENTAL PROTECTION AGENCY STATE OF ILLINOIS

L P C F C 0 5 5 C
(1) (8) (9)

OBSERVATION REPORT - SITE INVENTORY NO. _____
(11) (18)

_____ CO. - L.P.C. Region #_____ Date __/__/__
(20) (25)

_____/_____ Letter Sent (Yes or No)____
(Location) (Responsible Party) (26)

Samples Taken: Yes ( ) No ( ) Time: From __:____m Weather _____
Ground Water( ) Surface( ) Other( ) To __:____m
Photos Taken: Yes ( ) No ( ) Interviewed _____ Inspector ____ ____ ____
(27) (29)

Previous Inspection _____ Previous Correspondence _____ Site Open: Yes( ) No( )

OPERATIONAL STATUS:		TYPE OF OPERATION:				AUTHORIZATION:	
Operating	( )	Landfill	( )	Storage	( )	E.P.A. Permit	( )
Temporarily Closed	( )	Random Dump	( )	Salvage	( )	Variance	( )
Closed Not Covered	( )	Other _____	( )	A.C.D.	( )	21(e)	( )
Closed and Covered	( )	Quantity Received Daily(1-6)		_____ (30)		Board Order	( )
						Illegal (5)	( )____ (31)

IMPROVED

SAME

DETERIORATED

LPC 4 1/79 5,000

I S or D ____
(62)

GENERAL REMARKS: _____

INTERVIEW: _____

DIAGRAM:

5EWHME

09 JUN 1981

Peter M. Crosby, Vice-President
Performance Chemicals
Allied Chemical Corporation, Danville Works
P.O. Box 13
Danville, Illinois 61832

Re: Allied Chemical Corporation
Danville Works
Danville, Illinois ILD005463344

Dear Mr. Crosby:

Enclosed please find a copy of the report of the inspection dated April 2, 1981, conducted at the above facility by a representative of the Illinois Environmental Protection Agency (IEPA). The purpose of the inspection was to determine your facility's compliance status with the Resource Conservation and Recovery Act (RCRA) as amended by the Quiet Communities Act of 1978. We are pleased to report that your facility was found to be in compliance.

Your cooperation and efforts in this matter are appreciated. Should you have any questions about the report, please contact John Moran at (312) 353-2114.

Very truly yours,

JMoran/ng 6-8-81 6-6715

Gingher M.G. 6-8-81
Moran [illegible] 6-8-81
Baumgartner MG 6/8/81
Donaldson [illegible]
Leder _____

Arnold E. Leder, Chief
Compliance Section
Water & Hazardous Materials
Enforcement Branch

Enclosure

cc: John S. Moore, Manager
Division of Land/Noise Pollution Control
Illinois Environmental Protection Agency

bcc: Constantelos/Klepitsch
Stone
Baumgartner/Lewis
Phillip Westen, IEPA-Springfield
Moran

LPC 1838042 6
STATE IDENTIFICATION NUMBER
(If Applicable)

ILD005463344.
EPA IDENTIFICATION NUMBER

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
Form B Generator Inspection*
(40 CFR Part 262)

I. General Information:*

(A) Installation Name: Allied Chemical

(B) Street: PO Box 13, Brewer Rd.

(C) City: Danville (D) State: IL (E) Zip Code: 61832

(F) Phone: (217) 446-4700 (G) County: Vermilion

(H) Date of Inspection: 4-2-81 Time of Inspection (From) 10:30A (To) 12:30pm

(I) Weather Conditions: Clear windy 57°

(J) Person(s) interviewed	Title	Telephone
Norman A. Canter	Mgr Technical	(217) 446-4700
Dennis Hatfield	Regional Manager Environment Control	(312) 933-8851
S. K. Shogren	Environmental Supervisor, Midwest	(312) 933-8854

(K) Inspection Participants	Agency/Title	Telephone
Norman A. Canter		(217) 446-4700
Dennis Hatfield		(312) 933-8851
S. K. Shogren		(312) 933-8854

(L) Preparer Information

Name	Agency/Title	Telephone
Phillip C Westen	IEPA, EPS 1	(217) 782-6760

*Do not use this form if Generator is also a treatment, storage, and/or disposal facility. Complete form "A" if the Generator is also a TSD facility.

Rev. 1-27-81/J.B.

II. BRIEFLY DESCRIBE SITE ACTIVITY

Mfg refrigerants with by product of hydrochloric acid

III. MANIFEST REQUIREMENTS
(Subpart B)

		Yes	No	NI*	Remarks
(A)	Does the operator have copies of the manifest available for review?	N/A	Nothing shipped		
(B)	Do the manifest forms reviewed contain the following information? (If possible, make copies of, or record information from, manifests that do not contain the critical elements)				
	1. Manifest document number?				
	2. Name, mailing address, telephone number, and EPA ID number of generator?				
	3. Name and EPA ID Number of transporter(s)?				
	4. Name, Address, and EPA ID Number of designated permitted facility and alternate facility?				

*Not Inspected

	Yes	No	NI*	Remarks
5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	___	___	___	_____
6. The total quantity of waste(s) and the type and number of containers loaded?	___	___	___	_____
7. Required certification?	___	___	___	_____
8. Required signatures?	___	___	___	_____
(C) Does the owner or operator submit exception reports when needed?	___	___	___	_____

IV. PRE-TRANSPORT REQUIREMENTS

(A) Is waste packaged in accordance with DOT regulations? (Required prior to movement of hazardous waste off-site)	N/A at this time	___	___	waiting for a final state ruling on Silica gel. USEPA says is nonhazardous.
(B) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required prior to movement of hazardous waste off-site)	___	___	___	_____
(C) If required, are placards available to transporter?	___	___	___	_____
(D) Pre-shipment Accumulation:				
1. Are containers marked with start of accumulation date?	___	___	___	_____
2. Are the containers of hazardous waste removed from installation before they can accumulate for more than 90 days?	___	___	___	_____

*Not Inspected

	Yes	No	NI*	Remarks
3. Are wastes stored in containers managed in accordance with 40 CFR Part 265.174 and 265.176 (weekly inspections of containers, containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from facility's property line)?				~~volume is turned~~
4. If wastes are stored in tanks, are the tanks managed according to the following requirements:				
a. Are tanks used to store only those wastes which will not cause corrosion leakage or premature failure of the tank?	✓			volume is turned over approx 3x a day, go into a deep well.
b. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, dikes, or other containment structures?	N/A			
c. Do continuous feed systems have a waste-feed cutoff?	✓			manual shutoff
d. Are required daily and weekly inspections done?	✓			~~Levels~~ checked daily & weekly, with levels checked every 2 hrs.
e. Are reactive and ignitable wastes in tanks protected from sources of reaction and ignition, or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements)			✓	
f. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply)	N/A			
g. Has the owner or operator observed the National Fire Protection Association's buffer zone requirements for tanks containing ignitable or reactive wastes?	N/A			

*Not Inspected

Record the following information:

Tank capacity? 440,000 gallons in stanks { 20,000 / 20,000 / 400,000

Tank diameter? 40, 12, & 12 feet

Distance of tank from property line? ~~[illegible] ft~~ 500 feet at closest side

(see tables 2-1 through 2-6 of NEPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance)

V Training, Emergency Procedures

	YES	NO	NI*	Remarks
A. Do Personnel training records include: (Effective 5/19/81)				Is nearing completion of all training with certificate of training put in after each module is completed
1. Job Titles?	✓			~~is near~~
2. Job Descriptions?	✓			
3. Description of training?	✓			
4. Records of training?	✓			
5. Have facility personnel received required training by 5-19-81?	✓			will be ~~de~~ completed by required date
6. Do new personnel receive required training within six months?	✓		✓	
B. Preparedness and Prevention (Part 265, Subpart C)				
1. Maintenance and Operation of Facility:				
a. Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?		✓		NONE EVIDENT

*Not Inspected

2. If required, does this facility have the following equipment?

a. Internal communications or alarm systems?	✓	—	—	
b. Telephone or 2-way Radios at the scene of operations?	✓	—	—	6-2 way radios & phones. PA systems
c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?	✓	—	—	pH detectors in sewer line.

Indicate the volume of water and/or foam available for fire control

limestone piles with a tractor with a bucket, also soda ash on site. with 4-5 lift trucks. when tractor is down, rent a replacement.

3. Testing and Maintenance of Emergency Equipment:

a. Has the owner or operator established testing and maintenance procedures for emergency equipment?	✓	—	—	
b. Is emergency equipment maintained in operable condition?	✓	—	—	
4. Has owner/operator provided immediate access to internal alarms (if needed)?	✓	—	—	
5. Is there adequate aisle space for unobstructed movement?	✓	—	—	

C. Contingency Plan and Emergency Procedure (Part 265, Subpart D)

*Not Inspected

1. Does the contingency plan contain the following:

a. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part as applicable)	✓			
b. Arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to §265.37?	✓			
c. Names, addresses, and phone numbers (Office and Home) of all persons qualified to act as emergency coordinator.	✓			
d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list, and a brief outline of its capabilities?	✓			
e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes and alternate evacuation routes.	✓			

*Not Inspected

2. Are copies of the Contingency Plan available at site and local emergency organizations? ✓ — — _____

3. Emergency Coordinator

   a. Is the facility emergency Coordinator identified? ✓ — — _____

   b. Is coordinator familiar with all aspects of site operation and emergency procedures? ✓ — — _____

   c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan? ✓ — — _____

4. Emergency

   If an emergency situation has occured at this facility, has the emergency coordinator followed the emergency procdures listed in §265.56? — — ✓ No Emergency has occured here.

VI. RECORDKEEPING AND REPORTING
(Part 262, Subpart D)

(A) Are Manifests, Annual Reports, Exception Reports, and all test results and analyses retained for at least three years? N/A — — _____

(B) Has the generator submitted Annual Reports and Exception Reports as required? N/A — — _____

VII. INTERNATIONAL SHIPMENTS
(Part 262 Subpart E)

(A) Has the installation imported or exported hazardous waste? N/A — — _____

Not Inspected

(If A was answered Yes, then complete the following as applicable.)

1. Exporting Hazardous waste, has a generator:

   a. Notified the Administrator in writing? ___ ___ ___ _____

   b. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country? ___ ___ ___ _____

   c. Met the Manifest requirements? ___ ___ ___ _____

2. Importing Hazardous Waste, has the generator:

   Met the manifest requirements? ___ ___ ___ _____

VIII. Remarks

REMARKS: Facility wastes are compatable yet are kept in seperate tanks. All hazardous waste is injected into a deep well, waste is turned over in the tanks approx. 3 times a day.

Have a silica gel that has been placed in a few small drums. This waste is non-hazardous according to USEPA but by state of Ill standards it is hazardous. They are waiting for the state to make a final ruling so it can be disposed of.

The training program is being worked on. Most of the personnel have been trained to the needed extent of their jobs. All necessary material has been included in the outline.

The contingency plan appears complete. They have the safety equipment where it is needed along with drains in the curbed areas that collect the spill material this is pumped into the well.

ENVIRONMENTAL PROTECTION AGENCY STATE OF ILLINOIS

L P C F C 0 5 5 C
(1) (8) (9)

OBSERVATION REPORT - SITE INVENTORY NO. _____
(11) (18)

_____ CO. - L.P.C. Region #_____ Date __/__/__
(20) (25)

_____/_____ Letter Sent (Yes or No)____
(Location) (Responsible Party) (26)

Samples Taken: Yes ( ) No ( ) Time: From __:__ m Weather _____
Ground Water( ) Surface( ) Other( ) To __:__ m
Photos Taken: Yes ( ) No ( ) Interviewed _____ Inspector ____ ____
(27) (29)

Previous Inspection _____ Previous Correspondence _____ Site Open: Yes( ) No( )

OPERATIONAL STATUS:		TYPE OF OPERATION:				AUTHORIZATION:	
Operating	( )	Landfill	( )	Storage	( )	E.P.A. Permit	( )
Temporarily Closed	( )	Random Dump	( )	Salvage	( )	Variance	( )
Closed Not Covered	( )	Other _____	( )	A.C.D.	( )	21(e)	( )
Closed and Covered	( )	Quantity Received Daily(1-6)		_____ (30)		Board Order	( )
						Illegal (5)	( )____ (31)

IMPROVED

SAME

DETERIORATED

LPC 4 1/79 5,000

I S or D ____
(62)

GENERAL REMARKS: _____

INTERVIEW: _____

DIAGRAM:

ecology and environment, inc.
223 WEST JACKSON BLVD., CHICAGO, ILLINOIS 60606, TEL. 312-663-9415
International Specialists in the Environmental Sciences

DATE: December 30, 1980

TO: File

FROM: C.F. Bieze, Jr. CFB

SUBJECT: Illinois/Eckhardt Report Sites; TDD# F5-8011-4
? Danville/Allied Chemical

A review of available file information on the above site has been completed pursuant to TDD# F5-8011-4. Results of the file review indicate that a low priority of importance ranking be assessed to the site. This ranking is based upon the following factors:

1. The site is being monitored by Illinois EPA and/or the local health department.

2. No continuing health or illness problems have been attributed to the site.

The recommendation that no further action be taken by USEPA is made with the understanding that the state and local agencies now involved will continue to monitor site activities.

CFB/ct

(21)

recycled paper

U.S ENVIRONMENTAL PROTECTION AGENCY
REGION V
HAZARDOUS MATERIAL ENFORCEMENT AND RESPONSE PROGRAM

SITE NAME Danville Works
SITE ADDRESS Danville, Ill.
HOW/DATE IDENTIFIED Eckhardt Report
SITE DESCRIPTION Chemical Plant?

WASTE RELATED INFORMATION
HAZARD IDENTIFICATION

DATE	COMMENT
9/12/80	This is an Eckhardt site that the state didn't report on. The site is believed to be Allied Chemical in Danville, ~~state er~~ according to monte Neikirk of IEPA. State erroneously listed site as Danville Sanitary District.

X

EPA

POTENTIAL HAZARDOUS WASTE SITE
IDENTIFICATION AND PRELIMINARY ASSESSMENT

EGION	SITE NUMBER *(to be assigned by Hq)*
V	IL0000 10059

NOTE: This form is completed for each potential hazardous waste site to help set priorities for site inspection. The information submitted on this form is based on available records and may be updated on subsequent forms as a result of additional inquiries and on-site inspections.

GENERAL INSTRUCTIONS: Complete Sections I and III through X as completely as possible before Section II *(Preliminary Assessment)*. File this form in the Regional Hazardous Waste Log File and submit a copy to: U.S. Environmental Protection Agency; Site Tracking System; Hazardous Waste Enforcement Task Force *(EN-335)*; 401 M St., SW; Washington, DC 20460.

I. SITE IDENTIFICATION

A. SITE NAME: Danville Works ~~(Allied Chem.)~~

B. STREET *(or other identifier)*:

C. CITY: Danville

D. STATE: Ill.

E. ZIP CODE:

F. COUNTY NAME:

G. OWNER/OPERATOR *(if known)*

1. NAME:

2. TELEPHONE NUMBER:

H. TYPE OF OWNERSHIP

☐ 1. FEDERAL ☐ 2. STATE ☐ 3. COUNTY ☐ 4. MUNICIPAL ☐ 5. PRIVATE ☑ 6. UNKNOWN

I. SITE DESCRIPTION: This site is believed to be Allied Chemical in Danville according to monte Neikirk of IEPA State Erroneously listed this site as Danville Sanitary District.

J. HOW IDENTIFIED *(i.e., citizen's complaints, OSHA citations, etc.)*: Eckhardt report

K. DATE IDENTIFIED *(mo., day, & yr.)*:

L. PRINCIPAL STATE CONTACT

1. NAME:

2. TELEPHONE NUMBER:

II. PRELIMINARY ASSESSMENT *(complete this section last)*

A. APPARENT SERIOUSNESS OF PROBLEM

☐ 1. HIGH ☐ 2. MEDIUM ☐ 3. LOW ☐ 4. NONE ☑ 5. UNKNOWN

B. RECOMMENDATION

☐ 1. NO ACTION NEEDED *(no hazard)*

☐ 2. IMMEDIATE SITE INSPECTION NEEDED
a. TENTATIVELY SCHEDULED FOR:
b. WILL BE PERFORMED BY:

☐ 3. SITE INSPECTION NEEDED
a. TENTATIVELY SCHEDULED FOR:
b. WILL BE PERFORMED BY:

☐ 4. SITE INSPECTION NEEDED *(low priority)*

C. PREPARER INFORMATION

1. NAME: Gregg Wrisley

2. TELEPHONE NUMBER: ~

3. DATE *(mo., day, & yr.)*: 9/11/80

III. SITE INFORMATION

A. SITE STATUS

☐ 1. ACTIVE *(Those industrial or municipal sites which are being used for waste treatment, storage, or disposal on a continuing basis, even if infrequently.)*

☐ 2. INACTIVE *(Those sites which no longer receive wastes.)*

☐ 3. OTHER *(specify)*: *(Those sites that include such incidents like "midnight dumping" where no regular or continuing use of the site for waste disposal has occurred.)*

B. IS GENERATOR ON SITE?

☐ 1. NO ☐ 2. YES *(specify generator's four-digit SIC Code)*:

C. AREA OF SITE *(in acres)*:

D. IF APPARENT SERIOUSNESS OF SITE IS HIGH, SPECIFY COORDINATES

1. LATITUDE *(deg.-min.-sec.)*:

2. LONGITUDE *(deg.-min.-sec.)*:

E. ARE THERE BUILDINGS ON THE SITE?

☐ 1. NO ☐ 2. YES *(specify)*:

Continue On Reverse

EPA

POTENTIAL HAZARDOUS WASTE SITE
FINAL STRATEGY DETERMINATION

REGION	SITE NUMBER
V	

File this form in the regional Hazardous Waste Log; File and submit a copy to: U.S. Environmental Protection Agency; Site Tracking System; Hazardous Waste Enforcement Task Force (*EN-335*); 401 M St., SW, Washington, DC 20460.

I. SITE IDENTIFICATION

A. SITE NAME	B. STREET	
Danville Works	Brewer Road	
C. CITY	**D. STATE**	**E. ZIP CODE**
Danville	Ill	

II. FINAL DETERMINATION

Indicate the recommended action(s) and agency(ies) that should be involved by marking 'X' in the appropriate boxes.

RECOMMENDATION	MARK 'X'	ACTION AGENCY: EPA	STATE	LOCAL	PRIVATE
A. NO ACTION NEEDED	X	X			
B. REMEDIAL ACTION NEEDED, BUT NO RESOURCES AVAILABLE *(If yes, complete Section III.)*					
C. REMEDIAL ACTION *(If yes, complete Section IV.)*					
D. ENFORCEMENT ACTION *(If yes, specify in Part E whether the case will be primarily managed by the EPA or the State and what type of enforcement action is anticipated.)*					

E. RATIONALE FOR FINAL STRATEGY DETERMINATION

State monitoring site, no action needed

F. IF A CASE DEVELOPMENT PLAN HAS BEEN PREPARED, SPECIFY THE DATE PREPARED *(mo., day, & yr.)*	G. IF AN ENFORCEMENT CASE HAS BEEN FILED, SPECIFY THE DATE FILED *(mo., day, & yr.)*

H. PREPARER INFORMATION

1. NAME	2. TELEPHONE NUMBER	3. DATE *(mo., day, & yr.)*
Paul Dumock	886-6710	3-31-81

III. REMEDIAL ACTIONS TO BE TAKEN WHEN RESOURCES BECOME AVAILABLE

List all remedial actions, such as excavation, removal, etc. to be taken as soon as resources become available. See instructions for a list of Key Words for each of the actions to be used in the spaces below. Provide an estimate of the approximate cost of the remedy.

A. REMEDIAL ACTION	B. ESTIMATED COST	C. REMARKS
	$	
	$	
	$	
	$	
	$	
	$	
	$	
	$	
D. TOTAL ESTIMATED COST	$	

EPA Form T2070-5 (10-79)

Continue On Reverse

2081

ILD 005463344

ATTACHMENT 1

RECEIVED
WMD RCRA
RECORD CENTER

2-22-93
Comp

From: Allied-Signal, Inc.
P.O. Box 13, 5 Brewer Road
Danville, Illinois 61834-0013

To: Regional Administrator
U.S. EPA
Region V
230 South Dearborn Street
Chicago, Illinois 60604

Re: Soft Hammer Demonstration/Certification

In accordance with the Environmental Protection Agency's land disposal restrictions governing the first third scheduled wastes, I have enclosed a soft hammer demonstration and certification as per 40 CFR 268.8(a)(2) for the waste stream described by:

U.S. EPA Hazardous Waste Code (s): U211

CWM Profile Number: E 53175

Common Name: Waste carbon Tetrachloride

The demonstration reflects our efforts to locate practically available treatment that afford the greatest environmental benefit. Based on our search for such treatment, we have determined that (check one):

____ 1). No practically available treatment exists. See attached demonstration, attachments 2 and 3, for further details.

X 2). The best practically available treatment is: (See the attached demonstration, attachments 2, 3 and 4 for further details.)

If any further information is required, please contact me at: 217-446-4700

____ (telephone number).

B Darji (signature)

B. C. Darji (typed or printed name)

Environmental Supervisor (title)

1/29/90 (date)

ATTACHMENT 2

Through discussion with Chemical Waste Management and in accordance with 40 CFR 268.8(a)(1) I have developed this demonstration which is applicable to the following waste codes:

K017	P001	P016	P058	P092	P123	U016	U035	U057	U077	U099	U119	U136	U155	U173	U196	U216	U246
K031	P002	P018	P060	P102	U002	U018	U036	U058	U078	U101	U122	U140	U159	U174	U200	U217	U249
K041	P003	P020	P066	P105	U003	U019	U037	U060	U080	U103	U124	U142	U161	U176	U203	U218	
K042	P004	P026	P067	P107	U005	U020	U041	U061	U083	U105	U127	U143	U162	U177	U205	U219	
K046	P005	P027	P068	P108	U007	U021	U043	U062	U086	U108	U128	U144	U163	U178	U206	U220	
K073	P007	P038	P089	P110	U008	U022	U044	U063	U089	U108	U129	U146	U164	U179	U208	U226	
K084	P008	P037	P070	P112	U009	U023	U046	U064	U092	U109	U130	U147	U165	U190	U209	U227	
K085	P010	P048	P072	P113	U010	U025	U047	U066	U093	U110	U131	U148	U166	U191	U210	U228	
K087	P011	P049	P081	P114	U011	U028	U048	U067	U094	U111	U133	U150	U169	U188	U211	U237	
K098	P012	P050	P082	P115	U012	U029	U050	U070	U095	U114	U134	U154	U170	U189	U213	U238	
K105	P014	P054	P084	P120	U014	U031	U051	U073	U097	U115	U135	U155	U171	U192	U214	U239	
K106	P015	P057	P087	P122	U015	U032	U053	U074	U098	U118	U137	U157	U172	U193	U215	U244	

EXPLANATION KEY
See ATTACHMENT 4

FACILITY: Solvent Resource & Recovery Inc.
4301 Infirmary Road, West Carrollton, OH 45549
PHONE: (513) 859-6101
CONTACT: Carol Moody, Laboratory Manager
DATE: September 22,1988
TREATMENT: Solvent recovery, Fuels blending
RESPONSE: Facility unable to treat EPA listed wastes currently subject to the soft hammer; facility does not accept lab packs for solvent recovery or fuels blending.

FACILITY: Trade Waste Incineration
7 Mobile Ave., Sauget, IL 62201
PHONE: (618) 271-2804
CONTACT: Dennis Warchol, Environmental Manager
DATE: September 22, 1988
TREATMENT: Incineration
RESPONSE: Incineration is the practically available technology which yields the greatest environmental benefit. The waste is principally organic residues which are best destroyed by incineration.

c

FACILITY: Adams Center Landfill
4636 Adams Center Rd., Fort Wayne, IN 46806
PHONE: (219) 447-5585
CONTACT: Steve Ball, Technical Manager
DATE: April 20, 1989
TREATMENT: Land disposal/Stabilization
RESPONSE: Facility has the capability to meaningfully reduce the toxicity and/or mobility of inorganic constituents. Lab packs are not accepted for stabilization. Contamination of Carbon Tetrachloride is greather than 1000 ppm and cannot be handfilled.

FACILITY: CHEM-MET SERVICES INC.
18550 Allen Road
Wyandotte, MI 48192
PHONE: 313-282-9250
CONTACT: Judy Bihn DATE: January 29, 1990
TREATMENT: Waste Treatment and Disposal
RESPONSE: Facility is not licensed to handle Carbon Tetrachloride. Waste corrosives can be handled at this facility

ATTACHMENT 4

FIRST THIRD "SOFT-HAMMER" DEMONSTRATION

Soft-Hammer Waste For Which Practical Alternative Treatment or Recovery Has Been Located

A — Distillation of organic solvents for recycling/recovery is a practically available technology that yields the greatest environmental benefit.

B — Metals recovery is a practically available technology that yields the greatest environmental benefit. This waste is primarily heavy metal constituents which are present at recoverable concentrations.

C — Incineration is a practically available technology that yields the greatest environmental benefit. This waste is principally organic liquids or residues which are best destroyed by incineration.

D — Fuels blending is a practically available technology that yields the greatest environmental benefit. This waste had a heating value greater than or equal to 5,000 BTU per pound an can best be resused as a hazardous waste fuel.

E — A combination of Fuels Blending, and/or Incineration is a practically available technology that yields the greatest environmental benefit. This is due to the properties of my waste which may vary slightly, from one load to the next. Solid nondispersible residues (usually with a substantial inorganic content) with free liquids will need to be solidified prior to landfill disposal; but the pumpable or dispersible portions may be blended for hazardous waste fuels usage, (when the BTU's, chlorine, ash, etc. are within the required ranges); or else be solidified.

F — A combination of Fuels Blending, and/or Solidification is a practically available technology that yields the greatest environmental benefit. This is due to the properties of my waste which may vary slightly, from one load to the next. Solid nondispersible residues (usually with a substantial inorganic content) with free liquids will need to be solidified prior to landfill disposal; but the pumpable or dispersible portions may be blended for hazardous waste fuels usage, (when the BTU's, chlorine, ash, etc. are within the required ranges); or else be solidified.

G — Chemical Precipitation (with filtration and/or decanting) is a practically available technology that yields the greatest environmental benefit. This should reduce the toxicity/mobility of the hazardous constituents by reducing the toxic volume of the waste.

H — Filtration is a practically available technology that yields the greatest environmental benefit. This should reduce the toxicity/mobility of the hazardous constituents by reducing the toxic volume of the waste.

I — Chemical Oxidation is a practically available technology that yields the greatest environment benefit. Chemical Oxidation will reduce the toxicity of the hazardous constituents of the waste.

J — Stabilization is a practically available technology that yields the greatest environmental benefit. Stabilization will reduce the mobility of the hazardous constituents of the waste. I have examined recovery and destruction technologies and found that they were not practically available for the following reason(s): (see items K through R, below)

This waste is not suitable for incineration or fuels due to:

K — the low percentage of hazardous organic constituents present,

L — the low heating value of the waste,

M — the high percentage of inorganic constituents present,

N — the lack of located available capacity of incineration or fuels blending facilities.

This waste is not suitable for recovery due to:

O — the hazardous constituents are present in concentrations that make recovery technologically impossible.

P — the hazardous constituents are present in concentration that make recovery economically infeasible.

Q — No recovery facilities were located that could treat this type of waste.

R — No recovery facilities were located that had capacity to treat this type of waste.

S — Other comments or treatment/recovery (describe):

"SOFT HAMMER" WASTES*

LAND DISPOSAL RESTRICTION NOTIFICATION AND CERTIFICATION FORM

Generator Name: Allied-Signal Inc. Manifest Number: IL3026994

EPA Hazardous Waste Codes[1]: U211 CWM Profile Number: E53175

This form is submitted to Trade Waste Incineration in accordance with 40 CFR Part 268, which restricts the land disposal of certain hazardous wastes. I have marked the appropriate box below to indicate whether alte. .ative treatment has been found for my waste. (See reverse side for the list of "soft-hammer" wastes and instructions on using this form.)

☒ **A. SOFT-HAMMER WASTE FOR WHICH ALTERNATIVE TREATMENT OR RECOVERY HAS BEEN LOCATED**

I have identified a practically available treatment technology that yields the greatest environmental benefit. Together with the initial shipment of waste represented by this form, I submitted a demonstration to the Regional Administrator in accordance with 40 CFR 268.8(a)(1), including a list of facilities and facility officials contacted, complete with addresses, telephone numbers, and contact dates, and a justification that I have chosen the best treatment that is practically available. This treatment method is Incineration

"I certify under penalty of law that the requirements of 40 CFR 268.8(a) have been met and I have contracted to treat my waste (or will otherwise provide treatment) by the practically available technology which yields the greatest environmental benefit, as indicated in my demonstration. I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment."

☐ **B. SOFT-HAMMER WASTE FOR WHICH DISPOSAL IN LANDFILL OR SURFACE IMPOUNDMENT IS THE ONLY PRACTICAL ALTERNATIVE TO TREATMENT CURRENTLY AVAILABLE**

I have made a good-faith effort to locate and contract with treatment and recovery facilities practically available which can meaningfully reduce the toxicity or mobility of hazardous constituents in the waste, as an alternative to land disposal. I have found no such alternative facility. Together with the initial shipment of waste represented by this form, I submitted a demonstration in accordance with 40 CFR 268.8(a), including a list of facilities and facility officials contacted, addresses, telephone numbers, contact dates, and an explanation of why no treatment is practically available. This soft-hammer waste must be disposed of in a landfill or surface impoundment meeting the minimum technological standards until treatment standards are set for the waste or May 8, 1990, whichever occurs first.

"I certify under penalty of law that the requirements of 40 CFR 268.8(a)(1) have been met and that disposal in a landfill or surface impoundment is the only practical alternative to treatment currently available. I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false informations, including the possibility of fine or imprisonment."

☐ **C. TREATMENT OR RECOVERY FACILITY HAS TREATED THE WASTE**

The soft-hammer waste(s) noted above was treated in accordance with the generator's demonstration.

"I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and that, based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to comply with treatment as specified in the generator's demonstration. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment."

☐ **D. SOFT-HAMMER WASTE DESTINED FOR LAND DISPOSAL OTHER THAN IN LANDFILL OR SURFACE IMPOUNDMENT (e.g. DEEP INJECTION WELL)**

The soft-hammer waste(s) noted above is waste is being disposed of in a land disposal unit other than a landfill or surface impoundment and therefore is not subject to the certification and demonstration requirements described above.

Signature (B. C. DARJI) Title Environmental Supervisor Date 1/29/90

Copyright: November 1988 *WASTES FOR WHICH NO TREATMENT STANDARDS HAVE BEEN SET June 1989

[1]List all EPA Waste Codes present in this shipment of waste. Attach separate sheet, listing waste codes if necessary.

Pink

"HARD-HAMMER" WASTES *

LAND DISPOSAL RESTRICTIONS NOTIFICATION AND CERTIFICATION FORM

Generator Name: Allied-Signal Inc. Manifest Number: IL 302 6994

EPA Hazardous Waste Code(s): U211 CWM Profile Number: E 53175

This form is submitted to Trade Waste Incineration in accordance with 40 CFR Part 268, which restricts the land disposal of certain hazardous wastes. I have marked the appropriate box below to indicate how my waste must be managed to conform to the land disposal restrictions. For any waste(s) that meets part of the treatment standard and requires additional treatment, you must mark (1) box A (the waste requires treatment) and (2) box B.1, or B.2, or D (the waste satisfies part of the treatment standards).

☒ **A. RESTRICTED WASTE REQUIRES TREATMENT**

I am the initial generator of a restricted waste (i.e. solvent/dioxin, California List, or scheduled waste) which must be treated to the applicable treatment standard set forth in 40 CFR Part 268 Subpart D and all applicable prohibition set forth in 40 CFR 268.32 or RCRA Section 3004(d) prior to land disposal. This requirement applies to EPA hazardous waste code(s) U211.

☐ **B.1 RESTRICTED WASTE TREATED TO PERFORMANCE STANDARDS**

The EPA hazardous waste code(s) _____ has been treated in compliance with the applicable performance standards specified in 40 CFR Part 268 Subpart D. Supporting data is available to be provided as requested by the receiving facility.

"I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and that, based upon my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to comply with the performance levels specified in 40 CFR Part 268 Subpart D and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA Section 3004(d) without dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment."

☐ **B.2 RESTRICTED WASTES FOR WHICH THE TREATMENT STANDARD IS EXPRESSEDAS A SPECIFIED TECHNOLOGY**

"I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR 268.42. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment." This treatment has been performed for EPA hazardous waste code(s) _____ .

☐ **C. RESTRICTED WASTE SUBJECT TO A VARIANCE**

The waste identified above is subject to a national capacity variance, a treatability variance, or a case-by-case extension which expires on _____. This variance applies to EPA hazardous waste code(s) _____. If disposal occurs in a landfill or surface impoundment, the unit must meet the minium technological requirements. (Note: Wastes destined for deep well injection are subject to a separate set of variances. See instructions or 40 CFR Part 148.)

☐ **D. RESTRICTED WASTE CAN BE LAND DISPOSED WITHOUT FURTHER TREATMENT**

I am the initial generator of the following EPA hazardous waste code(s) _____. I have determined that the waste meets all applicable treatment standards set forth in 40 CFR Part 268 Subpart D, and all applicable prohibition levels set forth in Section 268.32 or RCRA Section 3004(d), and therefore can be land disposed without further treatment.

"I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR Subpart D and all applicable prohibitions set forth on 40 CFR 268.32 or RCRA section 3004(d). I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of a fine and imprisonment."

I hereby certify that all information submitted in this and all associated documents is complete and accurate to the best of my knowledge and information.

Signature B.C. Dayji (B.C. Dayji) Title Environmental Supervisor Date 1/29/90